

Exhibit U2

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IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

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4

EASTERN PROFIT CORPORATION LIMITED,

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Plaintiff/Counterclaim Defendant,

6

-against-

Case No.
18-cv-2185 (JGK)

7

STRATEGIC VISION US, LLC,

8

Defendants/Counterclaim Plaintiff,

9

-against-

10

GUO WENGUI a/k/a MILES KWOK,

11

Counterclaim Defendant.

12

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13

14

15

VIDEOTAPED DEPOSITION OF

16

YVETTE WANG

17

New York, New York

18

October 30, 2019

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ATKINSON-BAKER, INC.

22

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REPORTED BY: TERRI FUDENS

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FILE NO: ADOABD6A

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1 **YVETTE WANG**
2 A Just my lawyer, I believe.
3 **Q So only with Miss Cline?**
4 A Yes.
5 **Q Now did you speak with any nonlawyers**
6 **in preparation for your testimony today?**
7 A For today?
8 **Q Mm-hmm.**
9 A No, I didn't.
10 **Q Did you speak with any representative**
11 **of Eastern Profit other than Miss Cline in**
12 **preparation for your deposition today?**
13 MS. CLINE: Objection to form.
14 A I briefly ask some question.
15 **Q Okay. Of whom?**
16 A The director and a representative of
17 Eastern Profit.
18 **Q Okay. Are those two different people**
19 **or the same person?**
20 A Two different people.
21 **Q Who is the director of Eastern Profit**
22 **that you spoke with?**
23 A Mei Guo. M-E-I G-U-O.
24 **Q Okay. And who is the representative**
25 **that you spoke with?**

Page 22

1 **YVETTE WANG**
2 A Mr. Han, H-A-N.
3 **Q Is this Mr. Han Chunguang.**
4 A Correct.
5 **Q C-H-U-N-G-U-A-N-G; right?**
6 A C-H-U-N-G-U-A-N-G, yes.
7 **Q Does he sometimes go by Hank Han?**
8 A I don't know his English name.
9 You're talking about his English name?
10 **Q Yes. You never heard him called Hank**
11 **before?**
12 A I don't know that name.
13 **Q When did you speak with Mei Guo?**
14 A I don't remember clearly. Like a
15 couple of month ago.
16 **Q Was it in preparation for this**
17 **deposition?**
18 A I believe not because this deposition
19 was just ordered like a couple of days ago. How I
20 can prepare this deposition, it involves like a
21 couple of month.
22 **Q What did you speak with Mei Guo**
23 **about?**
24 A I don't remember clearly.
25 **Q Who is she?**

Page 23

1 **YVETTE WANG**
2 A A business woman.
3 **Q She's Guo Wengui's daughter; correct?**
4 A Correct.
5 **Q And she is the sole director of**
6 **Eastern Profit; is that correct?**
7 A Correct.
8 **Q Why did you -- well, let me ask you**
9 **this.**
10 **Did you speak to her in person or**
11 **over the phone?**
12 A I don't remember clearly. Should be
13 like in person, yeah.
14 **Q And is it your testimony that you do**
15 **not remember what you spoke to her about?**
16 A Is there any problem? Like a couple
17 of months ago if you ask me specific question, I
18 may be able to recall my memory about that
19 conversation because we met and we talk a lot. I
20 don't know which is the answer you ask.
21 **Q Okay. So it was a long conversation**
22 **with Mei Guo?**
23 MS. CLINE: Objection to form.
24 A I don't remember.
25 **Q I'm trying to understand, you said**

Page 24

1 **YVETTE WANG**
2 **you met and you talked a lot. What did you talk**
3 **about?**
4 A I don't understand your question.
5 **Q Did you talk a lot with Mei Guo when**
6 **you spoke with her a few months ago?**
7 A I don't understand your question.
8 **Q Where were you when you spoke with**
9 **Mei Guo in person a couple of months ago?**
10 A In New York.
11 **Q Where in New York?**
12 A A restaurant.
13 **Q Okay. Who else was with you?**
14 A Just myself and her.
15 **Q Had you met her before?**
16 A Yes.
17 **Q Was this a social meeting or a**
18 **business meeting?**
19 MS. CLINE: Objection to form.
20 A What is your definition? What is
21 social meeting? What is business meeting?
22 **Q What was the purpose of your meeting?**
23 A I don't understand your question.
24 **Q Why did you meet with her?**
25 A To ask her what is about Eastern

Page 25

7 (Pages 22 to 25)

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<p>1 YVETTE WANG</p> <p>2 Profit.</p> <p>3 Q Okay. So the purpose of the meeting</p> <p>4 was to ask her about Eastern Profit?</p> <p>5 A Kind of.</p> <p>6 Q Okay. Well what was the other</p> <p>7 purpose of the meeting?</p> <p>8 A Chat about the Chinese Communist</p> <p>9 Party took more action mainland of China to</p> <p>10 persecute my colleagues or my friends.</p> <p>11 Q Who requested the meeting?</p> <p>12 A Myself.</p> <p>13 Q Why did you want to talk to her about</p> <p>14 the persecution of your colleagues on the</p> <p>15 mainland?</p> <p>16 A Chat. Just chat.</p> <p>17 Q So during this chat, you also talked</p> <p>18 to her about Eastern Profit?</p> <p>19 A Correct.</p> <p>20 Q But at that time, as you said</p> <p>21 earlier, you did not know that this continuation</p> <p>22 deposition would be ordered?</p> <p>23 A What's your question?</p> <p>24 Q But at that time, as you testified</p> <p>25 earlier, you did not know that the continue</p> <p style="text-align: right;">Page 26</p>	<p>1 YVETTE WANG</p> <p>2 Q What was her response?</p> <p>3 A She was upset and she said she didn't</p> <p>4 know anything about this. And she ask me to</p> <p>5 handle everything.</p> <p>6 Q Okay. How did you respond to her</p> <p>7 request?</p> <p>8 A I said -- I don't remember the clear</p> <p>9 precise quote, but I told her okay. I have been</p> <p>10 already dealing with this group of liars, and this</p> <p>11 case, I will handle this for you. You don't need</p> <p>12 to worry because you don't know anything about</p> <p>13 this at all.</p> <p>14 Q How did you know that she didn't know</p> <p>15 anything about this at all?</p> <p>16 A I don't understand your question.</p> <p>17 Q How did you know that Guo Mei did not</p> <p>18 know anything about this at all?</p> <p>19 A Oh. That is my guess because I ask</p> <p>20 her: Did you hear or heard about these two liars,</p> <p>21 French Wallop and Michael Waller? She said I</p> <p>22 don't know.</p> <p>23 Q Was this after Strategic Vision had</p> <p>24 filed its counterclaim in this case?</p> <p>25 A When did you file counterclaim?</p> <p style="text-align: right;">Page 28</p>
<p>1 YVETTE WANG</p> <p>2 deposition would be ordered; did you?</p> <p>3 MS. CLINE: Objection to form.</p> <p>4 A Should I know by then what will</p> <p>5 happen after like a couple of month? Fair; right?</p> <p>6 Q Right. So the answer is no?</p> <p>7 A Correct.</p> <p>8 Q So why did you want to talk to her</p> <p>9 about Eastern Profit during this restaurant</p> <p>10 meeting?</p> <p>11 A Because Eastern Profit signed a</p> <p>12 Limited Power of Attorney authorize Golden Spring</p> <p>13 to handle this case.</p> <p>14 Q So were you reporting on the progress</p> <p>15 of the case?</p> <p>16 A What do you mean report?</p> <p>17 Q Tell. Were you telling her about the</p> <p>18 progress of the case?</p> <p>19 A I told her.</p> <p>20 Q Okay. And what did you tell her?</p> <p>21 A I told her Eastern Profit was</p> <p>22 cheated. And Eastern Profit right now is in a</p> <p>23 lawsuit. I probably need to know more, know more</p> <p>24 about Eastern Profit so I can help to deal with</p> <p>25 this litigation.</p> <p style="text-align: right;">Page 27</p>	<p>1 YVETTE WANG</p> <p>2 Q July 23rd.</p> <p>3 A Which year?</p> <p>4 Q 2019.</p> <p>5 A Oh. I don't remember that. It's in</p> <p>6 summer, but I don't remember which month. It's</p> <p>7 before you or after you. I don't remember that.</p> <p>8 Q What else did you discuss about</p> <p>9 Eastern Profit?</p> <p>10 A I ask like I remember the general,</p> <p>11 like basic information about Eastern Profit.</p> <p>12 Q What did she tell you?</p> <p>13 A The bank. The first thing she told</p> <p>14 me Eastern Profit bank accounts was frozen in Hong</p> <p>15 Kong.</p> <p>16 Q Okay. What else?</p> <p>17 A Eastern Profit is a Hong Kong</p> <p>18 company.</p> <p>19 Q I think you knew that at your first</p> <p>20 deposition. Do you remember that?</p> <p>21 A I don't remember that.</p> <p>22 Q What else did she tell you?</p> <p>23 A Before the bank accounts like was</p> <p>24 frozen, Eastern -- I don't remember that clearly.</p> <p>25 Kind of she told me Eastern has</p> <p style="text-align: right;">Page 29</p>

8 (Pages 26 to 29)

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<p>1 YVETTE WANG</p> <p>2 office in Hong Kong. And Eastern Profit, they</p> <p>3 have assets, yeah, because I was asking her about</p> <p>4 the general, like basic information about this</p> <p>5 company.</p> <p>6 Q Right.</p> <p>7 A So she told me these things.</p> <p>8 Q Do you remember anything else she</p> <p>9 told you?</p> <p>10 MS. CLINE: I'm just going to</p> <p>11 object to the line of inquiry. There</p> <p>12 is a narrow set of topics on which we</p> <p>13 agreed and the court issued an order</p> <p>14 that don't include, for example,</p> <p>15 whether or not Eastern Profit has any</p> <p>16 independent financial identities.</p> <p>17 I'm not sure why we're delving</p> <p>18 into every piece of every</p> <p>19 conversation she had with Guo Mei,</p> <p>20 and I think we should move on and get</p> <p>21 to the substance of the deposition as</p> <p>22 agreed upon.</p> <p>23 MR. GREIM: It's the only</p> <p>24 natural person we've heard about, so</p> <p>25 we're finally getting some relevant</p> <p style="text-align: right;">Page 30</p>	<p>1 YVETTE WANG</p> <p>2 Q So did she tell you during this</p> <p>3 discussion that Hank, as you said, or Han Chung</p> <p>4 Uang, was still running Eastern Profit at that</p> <p>5 time?</p> <p>6 A In my understanding, yes.</p> <p>7 Q Did she tell you what he does for</p> <p>8 Eastern Profit?</p> <p>9 A Not too much, because she expressed</p> <p>10 like as a normal business if the bank account was</p> <p>11 frozen or is frozen, what kind of business you can</p> <p>12 continue.</p> <p>13 But she emphasized Mr. Han as still</p> <p>14 helping her to like manage the cars and -- yeah,</p> <p>15 the cars. Basically the assets of Eastern Profit.</p> <p>16 Q Did you say cars as in automobiles?</p> <p>17 A Yeah. Driving car.</p> <p>18 Q Well, what else did she say about</p> <p>19 Mr. Han?</p> <p>20 A Still I remember back to our like CCP</p> <p>21 persecution chat. Mr. Han has his family member</p> <p>22 mainland of China also. So they are threatened</p> <p>23 and even arrested, integrated by Chinese Communist</p> <p>24 Party also.</p> <p>25 * Q Did you tell Mei Guo that you're</p> <p style="text-align: right;">Page 32</p>
<p>1 YVETTE WANG</p> <p>2 testimony. But I think we exhausted</p> <p>3 the witness on this.</p> <p>4 Q I do have a question. Did Guo Mei</p> <p>5 mention to you Han Chung Uang?</p> <p>6 A Yes.</p> <p>7 Q What did she say?</p> <p>8 A I don't remember the precise quotes</p> <p>9 again. Kind of like she told me Mr. Han, she</p> <p>10 trusted her -- trusted him, and he was running</p> <p>11 Eastern before.</p> <p>12 And Mei Guo, she has no problem or</p> <p>13 issue with him, and having him still running</p> <p>14 something on behalf of Eastern Profit.</p> <p>15 Q Did she say whether he actually still</p> <p>16 was running something on Eastern Profit?</p> <p>17 A Sorry. What's your question?</p> <p>18 Q Did she say whether he actually still</p> <p>19 was running something on behalf of Eastern Profit?</p> <p>20 A You mean he; right?</p> <p>21 Q Right.</p> <p>22 A You're asking what time period?</p> <p>23 Q I'm trying to understand what she</p> <p>24 told you.</p> <p>25 A Of course.</p> <p style="text-align: right;">Page 31</p>	<p>1 YVETTE WANG</p> <p>2 member of the Chinese Communist Party?</p> <p>3 MS. CLINE: Objection. This is</p> <p>4 a deposition in her corporate</p> <p>5 capacity. This is not about Miss</p> <p>6 Wong personally, and we really need</p> <p>7 to move on and get to the substance</p> <p>8 as to our agreement and the court's</p> <p>9 order.</p> <p>10 MR. GREIM: Okay. That's the</p> <p>11 last question, and we'll move on to</p> <p>12 your other prep for this deposition.</p> <p>13 MS. CLINE: No. I object to the</p> <p>14 question as beyond the scope.</p> <p>15 MR. GREIM: Well, the witness</p> <p>16 opened the door by talking about this</p> <p>17 persecution of Mr. Han.</p> <p>18 MS. CLINE: No. No. No. I</p> <p>19 object. We can call the court on</p> <p>20 this one if you want to, and we can</p> <p>21 make a list of everybody, and we're</p> <p>22 going to call the court.</p> <p>23 You're asking her about</p> <p>24 questions in her personal capacity,</p> <p>25 and that's not why she's here.</p> <p style="text-align: right;">Page 33</p>

9 (Pages 30 to 33)

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1 YVETTE WANG
 2 MR. GREIM: We will just simply
 3 mark that and keep going.
 4 **Q Okay. You said you also talked to**
 5 **Mr. Han Chung Uang who you characterized as a**
 6 **representative of Eastern Profit.**
 7 **When did you talk to Han Chung Uang**
 8 **in preparation for this case? Let me give you a**
 9 **different question.**
 10 **When did you talk with Mr. Han Chung**
 11 **Uang in preparation for this deposition?**
 12 A Again, this deposition was ordered
 13 like two, three ago. How I can prepare something
 14 which by then was not expected to happen with a
 15 precise date?
 16 My answer is I didn't talk to Mr. Han
 17 right before this deposition was ordered.
 18 **Q Okay. Fair enough. I will ask you a**
 19 **question that covers a little bit more.**
 20 **I would like to know whether you have**
 21 **gained information from talking to Han Chung Uang**
 22 **that you will use to answer the questions today?**
 23 A Obtained?
 24 **Q Obtained.**
 25 A Yes, I did.

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1 YVETTE WANG
 2 **Q So when -- when were the**
 3 **conversations that you had with Mr. Han Chung Uang**
 4 **about Eastern Profit since your last deposition?**
 5 A When? Since my last deposition. My
 6 last deposition is January of this year; right?
 7 Yeah, the conversation for sure
 8 happened in this year, yeah.
 9 **Q Okay. So we know you did not talk to**
 10 **him before your last deposition. So my question**
 11 **is that was January 31st, 2019. When have you**
 12 **talked to him since then to gain information about**
 13 **Eastern Profit?**
 14 A A couple of months ago.
 15 **Q A couple of months ago?**
 16 A Yes.
 17 **Q Was that the only time you talked to**
 18 **Mr. Chung Uang to gain information about Eastern**
 19 **Profit?**
 20 A You mean after my first deposition?
 21 **Q Correct.**
 22 A Correct.
 23 **Q Was the conversation with Mr. Chung**
 24 **Uang before or after your conversation with Mei**
 25 **Guo?**

Page 35

1 YVETTE WANG
 2 A Should be after, yeah.
 3 **Q Why do you say that?**
 4 A Because was Mei Guo, as I said, in
 5 summer, yeah. With Mr. Han should be like end of
 6 the summer.
 7 **Q Where did you meet with Mr. Han?**
 8 A I met him in the lobby of my office.
 9 **Q This is the 162 East 64th Street?**
 10 A Yes.
 11 **Q How long was your conversation with**
 12 **him?**
 13 A Not very long. Like 20, 30 minutes.
 14 **Q So did you talk right there in the**
 15 **lobby of Golden Spring?**
 16 A The lobby? I don't mean like a
 17 public everyone goes in and out. Yeah. There is
 18 a conference room in the lobby.
 19 **Q What did you ask Mr. Han?**
 20 A He asked me.
 21 **Q He asked you questions?**
 22 A Yeah.
 23 **Q What did he ask you?**
 24 A He told me he was chased by the
 25 lender for the one minute.

Page 36

1 YVETTE WANG
 2 **Q For the what?**
 3 A One million.
 4 MS. CLINE: One million.
 5 A U.S. dollars.
 6 **Q I see.**
 7 A He told me he doesn't speak too much
 8 English, and he asked me to handle this.
 9 **Q What do you mean the lender of the**
 10 **\$1 million? What are you referring to?**
 11 A I don't remember precisely his quote.
 12 He said kind of like as per the loan agreement,
 13 Eastern should pay back the 1 million loan.
 14 And he was not sure, and he doesn't
 15 know about the litigation, so he ask me to
 16 continue, help and handle completely.
 17 **Q Did Mr. Chung Uang say that someone**
 18 **else told him that Eastern Profit should pay back**
 19 **the million dollars, or did he tell you that**
 20 **Eastern Profit should pay back the \$1 million?**
 21 A He told me Eastern Profit borrowed
 22 this 1 million, and now Eastern is unable to pay
 23 back that. He was chased.
 24 **Q Did he tell you who Eastern Profit**
 25 **borrowed the money from?**

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10 (Pages 34 to 37)

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<p>1 YVETTE WANG</p> <p>2 A ACA.</p> <p>3 Q ACA?</p> <p>4 A ACA.</p> <p>5 Q Did he tell you that someone, a</p> <p>6 person actually chased him around New York City</p> <p>7 for the money? I'm trying to understand what you</p> <p>8 mean by chased? What do you mean by chased?</p> <p>9 MS. CLINE: Objection to form.</p> <p>10 Q What do you mean by chased?</p> <p>11 A What do you mean by chased? What do</p> <p>12 you mean by chased, like a stalk.</p> <p>13 Q Did he explain to you what he meant</p> <p>14 by chased? Is that the word he used?</p> <p>15 A He speaks Mandarin, Chinese.</p> <p>16 Q True. Okay. What did he tell you</p> <p>17 about the efforts of ACA to recover the</p> <p>18 \$1 million?</p> <p>19 A Oh, okay. He mentioned to me he was</p> <p>20 like called. Called. Called by a phone call.</p> <p>21 Q Called?</p> <p>22 A Yeah. And, yeah, like called like a</p> <p>23 couple of times he said.</p> <p>24 Q Did he say when he received the phone</p> <p>25 calls?</p> <p style="text-align: right;">Page 38</p>	<p>1 YVETTE WANG</p> <p>2 MS. CLINE: Same objection.</p> <p>3 A What is your question?</p> <p>4 Q Is dealing with ACA on behalf of</p> <p>5 Eastern Profit regarding the \$1 million loan part</p> <p>6 of GSNY's duties under the limited Power of</p> <p>7 Attorney? I'm asking you for your understanding</p> <p>8 as Eastern Profit.</p> <p>9 MS. CLINE: Objection to form.</p> <p>10 A I don't know what you mean dealing</p> <p>11 with.</p> <p>12 Q Communicating with ACA.</p> <p>13 A When? From when to when?</p> <p>14 Q Today.</p> <p>15 A He didn't clearly say that in our</p> <p>16 conversation, but my understanding should be yes.</p> <p>17 Q So Eastern Profit believes that it is</p> <p>18 authorized to deal with -- I'm sorry. Eastern</p> <p>19 Profit believes that Golden Spring is authorized</p> <p>20 to deal directly with ACA on repayment of the</p> <p>21 loan?</p> <p>22 MS. CLINE: Objection to the</p> <p>23 form. We may be going beyond the</p> <p>24 scope. It's not a memory test. If</p> <p>25 you have a question about the POA,</p> <p style="text-align: right;">Page 40</p>
<p>1 YVETTE WANG</p> <p>2 A I guess -- I couldn't guess, of</p> <p>3 course. Before he talk to me.</p> <p>4 Q Were they recent or they happened a</p> <p>5 long time ago?</p> <p>6 MS. CLINE: Objection to form.</p> <p>7 A I didn't ask him, but he was saying</p> <p>8 that he wanted me to continue handle all of this.</p> <p>9 Q What did he mean by all of this?</p> <p>10 MS. CLINE: Objection.</p> <p>11 Foundation.</p> <p>12 Q What did you understand that he meant</p> <p>13 when he said continue to handle all of this?</p> <p>14 A You're asking my understanding?</p> <p>15 Q Yes.</p> <p>16 A My understanding is we were</p> <p>17 authorized by a limited POA to deal with the</p> <p>18 contract until now including litigation, including</p> <p>19 like now I sit in front of you to be questioned.</p> <p>20 Q Is dealing with ACA on the loan part</p> <p>21 of the Limited Power of Attorney?</p> <p>22 MS. CLINE: Objection to the</p> <p>23 form.</p> <p>24 Q Is that covered within the limited</p> <p>25 Power of Attorney?</p> <p style="text-align: right;">Page 39</p>	<p>1 YVETTE WANG</p> <p>2 you can put it in front of her and</p> <p>3 ask her.</p> <p>4 A What's the question?</p> <p>5 Q Would you need to see the Power of</p> <p>6 Attorney to answer that question?</p> <p>7 A Yeah. That would be great.</p> <p>8 Q Okay. Let's do that.</p> <p>9 (Guo Exhibit 2, Limited Power of</p> <p>10 Attorney Bates stamped Eastern-000276</p> <p>11 and 277 previously marked for</p> <p>12 Identification as of this date.)</p> <p>13 I'm going to hand you what we marked</p> <p>14 as Guo Exhibit 2. We're not going to remark this.</p> <p>15 I'm just going to hand you what we marked as Guo</p> <p>16 Exhibit 2. Please give one to your attorney. And</p> <p>17 you'll see it already says Guo Exhibit 2, and it's</p> <p>18 Bates labeled 276 -- Eastern 276 to Eastern 277.</p> <p>19 Do you recognize this document?</p> <p>20 A Yes.</p> <p>21 Q Is this the Limited Power of Attorney</p> <p>22 that Eastern Profit granted to Golden Spring, New</p> <p>23 York?</p> <p>24 A Yes.</p> <p>25 Q And is the negotiation of -- we'll</p> <p style="text-align: right;">Page 41</p>

11 (Pages 38 to 41)

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<p>1 YVETTE WANG</p> <p>2 start with -- I'm going to break this apart.</p> <p>3 Okay?</p> <p>4 I'm going to ask you about the loan</p> <p>5 that Eastern Profit claims it has with ACA. Okay?</p> <p>6 My first question is is negotiation of that loan</p> <p>7 between Eastern Profit and ACA one of the powers</p> <p>8 that Eastern Profit granted Golden Spring under</p> <p>9 this Power of Attorney?</p> <p>10 MS. CLINE: You're asking her to</p> <p>11 read the document?</p> <p>12 Q I'm asking for Eastern Profit's</p> <p>13 testimony. If you want to look at the document if</p> <p>14 that would help, that's fine. If you think you</p> <p>15 personally know it, that's fine too.</p> <p>16 MS. CLINE: This deposition is</p> <p>17 not about her personal knowledge.</p> <p>18 A Can I read this?</p> <p>19 Q Go ahead.</p> <p>20 A (Reading) What's your question?</p> <p>21 Q I'll have the court reporter just</p> <p>22 read it back.</p> <p>23 (The requested portion of the</p> <p>24 record was read back by the</p> <p>25 reporter.)</p> <p style="text-align: right;">Page 42</p>	<p>1 YVETTE WANG</p> <p>2 Has Eastern Profit asked Golden</p> <p>3 Spring New York to deal on Eastern Profit's behalf</p> <p>4 with ACA regarding the loan?</p> <p>5 A You asked about when?</p> <p>6 Q As of now.</p> <p>7 A In my conversation with Mr. Han, he</p> <p>8 mentioned to me or he asked me can you please</p> <p>9 explain what is happening to ACA about this loan,</p> <p>10 because I was or I am chased to ask before pay</p> <p>11 back. I don't know how to explain to ACA.</p> <p>12 Q How did you respond him?</p> <p>13 A I said okay.</p> <p>14 Q Was this the first time Mr. Chunguang</p> <p>15 had told you that ACA was trying to recover this</p> <p>16 million dollar payment?</p> <p>17 A I don't remember clearly, but yes.</p> <p>18 Q Before your conversation with</p> <p>19 Mr. Chunguang, had you heard from anyone, from any</p> <p>20 other source, that ACA was trying to recover the</p> <p>21 million dollar payment?</p> <p>22 A What's your question?</p> <p>23 Q Before this conversation with</p> <p>24 Mr. Chunguang, had you heard from anyone, from any</p> <p>25 other source that ACA was trying to recover the</p> <p style="text-align: right;">Page 44</p>
<p>1 YVETTE WANG</p> <p>2 MS. CLINE: I'm going to repeat</p> <p>3 my objection to form. You're asking</p> <p>4 the witness to interpret a document</p> <p>5 that speaks for itself and we can all</p> <p>6 read.</p> <p>7 A This limited Power of Attorney in my</p> <p>8 understanding is talking about Eastern Profit's</p> <p>9 Corporation Limited authorized Golden Spring New</p> <p>10 York Limited to deal with the contract with</p> <p>11 Strategic Vision.</p> <p>12 Q There's no reference to ACA in here,</p> <p>13 is there?</p> <p>14 A I didn't see that name on these two</p> <p>15 pages.</p> <p>16 Q So let me ask you this. Separate and</p> <p>17 apart from this Limited Power of Attorney, has</p> <p>18 Eastern Profit asked Golden Spring New York to</p> <p>19 deal with ACA regarding the purported Eastern</p> <p>20 Profit ACA loan?</p> <p>21 A What do you mean purported?</p> <p>22 Q The loan.</p> <p>23 A Okay.</p> <p>24 Q Has Eastern Profit -- I'll repeat the</p> <p>25 question.</p> <p style="text-align: right;">Page 43</p>	<p>1 YVETTE WANG</p> <p>2 million dollar payment?</p> <p>3 A Yes, I did.</p> <p>4 Q From where?</p> <p>5 A I remember ACA mentioned this to me</p> <p>6 also.</p> <p>7 Q When was that?</p> <p>8 A Kind of like by the -- long time ago.</p> <p>9 By the end of or fall of 2018.</p> <p>10 Q Who is the person from ACA who</p> <p>11 contacted you?</p> <p>12 A William.</p> <p>13 Q William who?</p> <p>14 A William Yu.</p> <p>15 Q How do you spell that in English?</p> <p>16 A William?</p> <p>17 Q No. Yu.</p> <p>18 A Y-U.</p> <p>19 Q Is William Yu also sometimes called</p> <p>20 William Je, J-E?</p> <p>21 A I don't know his other name.</p> <p>22 Q Does he also go by Je Kin Ming, J-E</p> <p>23 K-I-N M-I-N-G?</p> <p>24 A I just know his name is William.</p> <p>25 Q Did William reach out to you by phone</p> <p style="text-align: right;">Page 45</p>

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<p>1 YVETTE WANG</p> <p>2 or E-mail?</p> <p>3 A In the fall of 2018, like last year,</p> <p>4 a year ago, I believe I met him in the restaurant</p> <p>5 again.</p> <p>6 Q And he mentioned it over lunch or</p> <p>7 dinner?</p> <p>8 A Dinner?</p> <p>9 Q Yes, over dinner?</p> <p>10 A Yes, dinner.</p> <p>11 Q Who else was present, if anyone?</p> <p>12 A Just me and him.</p> <p>13 Q What did he say?</p> <p>14 A About what?</p> <p>15 Q About the million dollar loan.</p> <p>16 A I don't remember precisely what he</p> <p>17 said. Kind of he asked, I heard you are cheated,</p> <p>18 and then I briefly told her.</p> <p>19 Q Told him?</p> <p>20 A Yeah, told him. Yeah. We were</p> <p>21 cheated by two liars.</p> <p>22 Q So did he demand repayment of the</p> <p>23 million dollars from Eastern Profit?</p> <p>24 A You mean in our dinner?</p> <p>25 Q Yes.</p> <p style="text-align: right;">Page 46</p>	<p>1 YVETTE WANG</p> <p>2 Q Did you tell him at the dinner that</p> <p>3 you met Eastern?</p> <p>4 A What's the question?</p> <p>5 MS. CLINE: Objection to form.</p> <p>6 Q Did you tell him at the dinner that</p> <p>7 when you said that you were cheated, you actually</p> <p>8 meant Eastern?</p> <p>9 MS. CLINE: Objection to form.</p> <p>10 A You mean I mean Eastern or I said</p> <p>11 Eastern? What is the question?</p> <p>12 Q Did you tell Mr. Je or Mr. Yu that</p> <p>13 Eastern was the one that was cheated?</p> <p>14 MS. CLINE: Objection to form.</p> <p>15 A I didn't pronounce Eastern is worse,</p> <p>16 but I said I was cheated. We were cheated. Which</p> <p>17 if you want to understand who they are, we or I,</p> <p>18 in my understanding they are the Eastern people,</p> <p>19 not including myself.</p> <p>20 Q Who else?</p> <p>21 A Who else?</p> <p>22 MS. CLINE: Objection to form.</p> <p>23 A Oh, yeah. I forgot this one. Miles,</p> <p>24 M-I-L-E-S.</p> <p>25 Q This is Guo Wengui?</p> <p style="text-align: right;">Page 48</p>
<p>1 YVETTE WANG</p> <p>2 A He mentioned that. Kind of a -- he</p> <p>3 said we are expecting the result, but you are</p> <p>4 cheated. And the loan agreement, the loan kind of</p> <p>5 like need to be pay back.</p> <p>6 Q What result did he say he was</p> <p>7 expecting?</p> <p>8 MS. CLINE: Objection to form.</p> <p>9 A Generally they corrupted Chinese</p> <p>10 official information.</p> <p>11 Q So William Je said he expected that</p> <p>12 information?</p> <p>13 MS. CLINE: Objection to form.</p> <p>14 A Correct.</p> <p>15 Q Did you tell him that, in fact, you</p> <p>16 were cheated?</p> <p>17 MS. CLINE: Objection to form.</p> <p>18 A Yes.</p> <p>19 Q And who is the "you" who was cheated?</p> <p>20 A Myself.</p> <p>21 Q "You," Yang Ping Wang? (Phonetic)</p> <p>22 A When I say I was cheated, I mean I</p> <p>23 should say Eastern, because -- if you're asking</p> <p>24 about contract. But I was authorized by Eastern.</p> <p>25 So if I say I, I mean Eastern.</p> <p style="text-align: right;">Page 47</p>	<p>1 YVETTE WANG</p> <p>2 A Correct.</p> <p>3 Q Okay. Who else?</p> <p>4 A Man Cho Han.</p> <p>5 Q Who else?</p> <p>6 A Who do you want else?</p> <p>7 Q Who were the people? You said the</p> <p>8 Eastern people were cheated. I'm asking who are</p> <p>9 those Eastern people that you are referring to?</p> <p>10 You mentioned Guo, you mentioned</p> <p>11 Lianchao.</p> <p>12 A You cannot define my term by</p> <p>13 yourself, okay. I say Eastern people. I don't</p> <p>14 mean Eastern's employee, or Eastern's director or</p> <p>15 Eastern's like whatever.</p> <p>16 I mean the people on Eastern's side</p> <p>17 who are authorized, who is designated, and who has</p> <p>18 the same goal to take down Chinese Communist</p> <p>19 Party.</p> <p>20 That is my definition about Eastern</p> <p>21 people.</p> <p>22 Q Very good. We'll come back to that.</p> <p>23 That's a separate section. So let me bring us</p> <p>24 back to the outline here so I cover everything.</p> <p>25 Before we leave this discussion with</p> <p style="text-align: right;">Page 49</p>

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<p>1 YVETTE WANG</p> <p>2 William Yu, did you commit to him that Eastern</p> <p>3 Profit would pay him back the million dollars?</p> <p>4 MS. CLINE: Objection to form.</p> <p>5 A What do you mean committed?</p> <p>6 Q Tell.</p> <p>7 A In my understanding, this is a low</p> <p>8 agreement between lender and a borrower. And the</p> <p>9 borrower should pay back the money, which means</p> <p>10 Eastern should pay back.</p> <p>11 Q My question is what you told him</p> <p>12 though. Not how you characterize this, but my</p> <p>13 question is: What did you tell Mr. Yu?</p> <p>14 A I prefer not to use told. I agreed.</p> <p>15 Q So you -- so Mr. Yu told you that he</p> <p>16 expected Eastern Profit to pay a million dollars</p> <p>17 to ACA. You told him that you agreed?</p> <p>18 A With interest.</p> <p>19 Q With interest?</p> <p>20 A Yeah.</p> <p>21 Q Did you have authority to tell Mr. Yu</p> <p>22 that on behalf of Eastern?</p> <p>23 MS. CLINE: Objection to form.</p> <p>24 A Authority? What do you mean</p> <p>25 authority?</p> <p style="text-align: right;">Page 50</p>	<p>1 YVETTE WANG</p> <p>2 Mr. Yu, had Eastern Profit given you authority to</p> <p>3 deal with Mr. Yu about repayment of the loan?</p> <p>4 MS. CLINE: Objection to form.</p> <p>5 A When William mentioned to me I will</p> <p>6 have to ask the loan to be asked. I have to ask</p> <p>7 the loan to be fully paid back with interest. I</p> <p>8 said yes. I agree with you. I didn't say there</p> <p>9 is any reason. You couldn't.</p> <p>10 Q My question to you --</p> <p>11 A That was my conversation with William</p> <p>12 about this loan.</p> <p>13 Q Okay. My question now to you is</p> <p>14 Eastern Profit is -- were you acting as Eastern</p> <p>15 Profit's agent in having that discussion with</p> <p>16 William Yu about the loan?</p> <p>17 A You mean before my dinner with</p> <p>18 William?</p> <p>19 Q During your dinner with William, were</p> <p>20 you acting as Eastern Profits' agent in saying</p> <p>21 yes, I agree with you that the loan should be</p> <p>22 repaid, or you're just expressing your own</p> <p>23 personal opinion?</p> <p>24 A Oh. It's much easier to understand</p> <p>25 now. I would express my personal opinion and</p> <p style="text-align: right;">Page 52</p>
<p>1 YVETTE WANG</p> <p>2 Q Well, had Eastern given you authority</p> <p>3 to deal with ACA regarding the loan?</p> <p>4 MS. CLINE: Objection to form.</p> <p>5 A Deal with ACA about the loan? It's</p> <p>6 too general. I couldn't understand your question.</p> <p>7 Q Well, we just looked at the limited</p> <p>8 Power of Attorney. It's not in there; is it?</p> <p>9 MS. CLINE: Objection.</p> <p>10 A What is not there?</p> <p>11 Q Your authority to deal with ACA</p> <p>12 regarding its purported loan to Eastern Profit is</p> <p>13 not set forth in the Power of Attorney; is it? We</p> <p>14 just looked at it.</p> <p>15 MS. CLINE: Objection. You're</p> <p>16 mischaracterizing the document and</p> <p>17 her testimony, and I think you're</p> <p>18 trying to confuse the witness. She's</p> <p>19 here as a representative of Eastern</p> <p>20 Profit. Later you can ask her about</p> <p>21 the role of Golden Spring.</p> <p>22 Q I'm asking for Eastern Profit's</p> <p>23 understanding about what power you had to deal</p> <p>24 with ACA regarding the loan.</p> <p>25 So when you were speaking with</p> <p style="text-align: right;">Page 51</p>	<p>1 YVETTE WANG</p> <p>2 Eastern's also.</p> <p>3 Q So why are you able to say that you</p> <p>4 were expressing Eastern's opinion?</p> <p>5 MS. CLINE: Objection to form.</p> <p>6 A You're asking my personal</p> <p>7 understanding; right?</p> <p>8 Q No. I'm asking why is -- Eastern is</p> <p>9 sitting here today telling me that when you told</p> <p>10 William Yu yes, I agree with you, that you were</p> <p>11 speaking on behalf of it. And I'm saying on what</p> <p>12 basis. How or why did Eastern give you authority</p> <p>13 to speak on its behalf with William Yu?</p> <p>14 MS. CLINE: Objection to form.</p> <p>15 A I still don't quite understand your</p> <p>16 question.</p> <p>17 Q Okay. We'll break it down. We'll</p> <p>18 break it down.</p> <p>19 Did someone from Eastern tell you</p> <p>20 that you should deal with William Yu regarding the</p> <p>21 purported ACA to Eastern Profit loan?</p> <p>22 A By that dinner, I don't remember</p> <p>23 clearly. I don't remember clearly. I was talking</p> <p>24 with William. Again, I was thinking that I have</p> <p>25 this case in my hands. And this is a -- sounds</p> <p style="text-align: right;">Page 53</p>

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<p>1 YVETTE WANG</p> <p>2 like in my understanding a no more business loan</p> <p>3 agreement, and people should pay back.</p> <p>4 Q Now do you recall on January 31, 2019</p> <p>5 at your first deposition you testified that you</p> <p>6 had not seen the loan agreement.</p> <p>7 Do you recall that?</p> <p>8 MS. CLINE: Objection. If you</p> <p>9 want to ask her about her testimony,</p> <p>10 you can show her the transcript.</p> <p>11 Q I'm happy to show you the transcript.</p> <p>12 Do you want to look at it?</p> <p>13 Let me do this. Do you recall</p> <p>14 offhand whether you had seen the loan agreement</p> <p>15 yet when you gave your first deposition in this</p> <p>16 case?</p> <p>17 A You're asking when I was deposed for</p> <p>18 the first time, by then did I ever see with my own</p> <p>19 eyes the loan agreement or not?</p> <p>20 Q Right.</p> <p>21 A I heard --</p> <p>22 Q Right.</p> <p>23 A -- the loan agreement.</p> <p>24 Q So as of January, 2019, you had heard</p> <p>25 there was a loan agreement. You had not yet seen</p> <p style="text-align: right;">Page 54</p>	<p>1 YVETTE WANG</p> <p>2 A Oh. In my dinner --</p> <p>3 Q Yes.</p> <p>4 A -- with William?</p> <p>5 Q Yes.</p> <p>6 A I told him Eastern should pay back.</p> <p>7 Q Did Eastern have an understanding how</p> <p>8 it was going to pay back the loan?</p> <p>9 A By this lawsuit. That's why Eastern</p> <p>10 sued, to get this 1 million back, because</p> <p>11 Eastern's bank account was frozen.</p> <p>12 Q It wasn't frozen yet at that time in</p> <p>13 the fall of 2018?</p> <p>14 MS. CLINE: Objection to form.</p> <p>15 A Eastern's bank account was frozen</p> <p>16 around June of 2018, yes.</p> <p>17 Q Although that was after the lawsuit</p> <p>18 was filed, wasn't it? The lawsuit was filed in</p> <p>19 March of 2018; isn't that right?</p> <p>20 MS. CLINE: Objection again.</p> <p>21 This is a memory test.</p> <p>22 A Oh, yeah. This is a memory test. My</p> <p>23 mistake.</p> <p>24 You're confusing me with all these</p> <p>25 dates back and forward, Eddie.</p> <p style="text-align: right;">Page 56</p>
<p>1 YVETTE WANG</p> <p>2 it?</p> <p>3 A Correct.</p> <p>4 Q So this discussion with Mr. Yu</p> <p>5 happened in the fall of 2018. You just testified</p> <p>6 several months before your deposition. So when</p> <p>7 you were speaking with Mr. Yu, you had not yet</p> <p>8 seen the loan agreement; correct?</p> <p>9 A I did not see physically the hard</p> <p>10 copy paper in front of me was my personal</p> <p>11 knowledge. I was testifying my gained knowledge</p> <p>12 or obtained knowledge.</p> <p>13 Q When did you first hear that there</p> <p>14 was a loan between ACA and EP, Eastern Profit.</p> <p>15 A 2018.</p> <p>16 Q Was it before the dinner with Mr. Yu?</p> <p>17 A I don't remember that.</p> <p>18 Q Do you think maybe you learned of the</p> <p>19 loan agreement from Mr. Yu?</p> <p>20 A Possibly. I don't remember that</p> <p>21 clearly.</p> <p>22 Q Did you tell Mr. Yu how Eastern</p> <p>23 Profit intended to repay the loan?</p> <p>24 A Intend? What do you mean intend?</p> <p>25 Q Planned.</p> <p style="text-align: right;">Page 55</p>	<p>1 YVETTE WANG</p> <p>2 So correction. Eastern's bank</p> <p>3 account was frozen. When is it this contract was</p> <p>4 signed with SV's contract.</p> <p>5 Q It's dated -- it was signed</p> <p>6 January 6, 2018.</p> <p>7 A January, 2018. Eastern's bank</p> <p>8 account was frozen in June of 2017. This is the</p> <p>9 correct answer.</p> <p>10 MS. CLINE: Can we take a break</p> <p>11 pretty soon. We've being going for</p> <p>12 over an hour.</p> <p>13 MR. GREIM: Yes. Good point.</p> <p>14 I'm going to finish up with this.</p> <p>15 I'm thinking the same thing because</p> <p>16 I'm running low.</p> <p>17 Q Let me go back to your discussion</p> <p>18 with Mr. Chunguang.</p> <p>19 Who did he say was calling him from</p> <p>20 ACA?</p> <p>21 MS. CLINE: Objection to form.</p> <p>22 A What was the question?</p> <p>23 Q You said that Mr. Chunguang told you</p> <p>24 somebody was chasing him about the million dollar</p> <p>25 loan.</p> <p style="text-align: right;">Page 57</p>

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October 30, 2019

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<p>1 YVETTE WANG</p> <p>2 A Correct.</p> <p>3 Q I gather that somebody was not</p> <p>4 actually following him around the streets for</p> <p>5 collection. I gather that you mean somebody was</p> <p>6 contacting him; correct?</p> <p>7 A Correct.</p> <p>8 Q And who was the person who was</p> <p>9 contacting him?</p> <p>10 MS. CLINE: Objection.</p> <p>11 Q Who did he say?</p> <p>12 MS. CLINE: Objection to form.</p> <p>13 A You're asking the name; right?</p> <p>14 Q Yes. Yes.</p> <p>15 A William.</p> <p>16 Q Did he say whether William -- this is</p> <p>17 the same William Yu, or the same William Yu that</p> <p>18 you mentioned before?</p> <p>19 A Correct.</p> <p>20 Q Did he say how William Yu was</p> <p>21 contacting him?</p> <p>22 A What was the question?</p> <p>23 Q Did he say how William Yu was</p> <p>24 contacting him?</p> <p>25 A You mean by what kind of a</p> <p style="text-align: right;">Page 58</p>	<p>1 YVETTE WANG</p> <p>2 Q Yes I am, actually.</p> <p>3 A Wow. Year?</p> <p>4 Q Something he said gave you the</p> <p>5 impression that the calls had been happening for</p> <p>6 about a year?</p> <p>7 A Yes.</p> <p>8 Q But you can't remember the exact</p> <p>9 words he used?</p> <p>10 A If you want me to translate, because</p> <p>11 he speaks Mandarin, he used long time, always some</p> <p>12 words like that.</p> <p>13 Q Did he know William Je by the way;</p> <p>14 was William Je known to him?</p> <p>15 MS. CLINE: Objection.</p> <p>16 Foundation.</p> <p>17 This is beyond the scope of a</p> <p>18 30(b)(6) of Eastern Profit.</p> <p>19 Q It's important to understand whether</p> <p>20 the Eastern Profit purported representative</p> <p>21 dealing with ACA on repayment of the loan, whether</p> <p>22 they're known to each other or not.</p> <p>23 Did you get the understanding from</p> <p>24 talking to Mr. Han that he was already familiar</p> <p>25 with William Yu?</p> <p style="text-align: right;">Page 60</p>
<p>1 YVETTE WANG</p> <p>2 communication tool; right?</p> <p>3 Q Yes. Yes.</p> <p>4 A He said phone call.</p> <p>5 Q Did he say how many phone calls?</p> <p>6 A A couple of.</p> <p>7 Q And your testimony is he did not say</p> <p>8 when he had received these phone calls?</p> <p>9 MS. CLINE: Objection to form.</p> <p>10 A You're asking did he tell me on which</p> <p>11 dates he was caught?</p> <p>12 Q Just generally when. If he gave you</p> <p>13 dates, great.</p> <p>14 A Which unfortunately he didn't give me</p> <p>15 the dates.</p> <p>16 Q Did he tell you it was recent?</p> <p>17 MS. CLINE: Objection to form.</p> <p>18 A Not only recent. Yeah. He said --</p> <p>19 he told me he was called or he was chased for long</p> <p>20 time.</p> <p>21 Q Just a few more questions, and then</p> <p>22 we will take a break here.</p> <p>23 What do you mean for a long time?</p> <p>24 A You're asking my personal</p> <p>25 understanding?</p> <p style="text-align: right;">Page 59</p>	<p>1 YVETTE WANG</p> <p>2 MS. CLINE: Again, this is a</p> <p>3 corporate designee deposition of</p> <p>4 Eastern Profit. You subpoenaed</p> <p>5 everyone whose name has ever been</p> <p>6 mentioned in this case. You can ask</p> <p>7 more appropriate people those types</p> <p>8 of questions.</p> <p>9 MR. GREIM: Okay. I'll just ask</p> <p>10 Eastern Profit.</p> <p>11 Q Was William Yu familiar with -- I'm</p> <p>12 sorry. Was Mr. Han familiar with William Yu?</p> <p>13 MS. CLINE: Objection.</p> <p>14 Foundation.</p> <p>15 A I don't remember my filling, that</p> <p>16 conversation. Eddie is asking my personal</p> <p>17 filling.</p> <p>18 Q Well I'm not asking -- I'm asking --</p> <p>19 forget about your feelings. Sorry. It sounds</p> <p>20 terrible.</p> <p>21 A I'm fine.</p> <p>22 Q I'm asking Eastern Profit whether the</p> <p>23 person it claims is its principal is familiar with</p> <p>24 William Yu.</p> <p>25 MS. CLINE: Objection.</p> <p style="text-align: right;">Page 61</p>

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<p>1 YVETTE WANG 2 Foundation. 3 You're going to depose Mr. Han. 4 You can ask him a question directly. 5 MR. GREIM: Okay. If this 6 representative doesn't know that, 7 that's okay. 8 Q But if Eastern Profit knows the 9 answer, I would like to know the answer. 10 A I cannot talk on behalf of any 11 individual. His or her personal knows someone or 12 don't know someone, familiar with someone or not 13 familiar with someone. 14 MR. GREIM: All right. Let's 15 take a break. Let's take a 10-minute 16 break, if that's okay. 17 Does that make sense? 18 THE VIDEOGRAPHER: The time is 19 11:36 a.m., Wednesday, October 30, 20 2019. This is the end of media 21 number one of the videotaped 22 deposition of Miss Yvette Wang. 23 We are off the record. 24 (At this time, a brief recess 25 was taken.)</p> <p style="text-align: right;">Page 62</p>	<p>1 YVETTE WANG 2 ACA regarding the million dollar loan? 3 MS. CLINE: Objection to form. 4 A In my understanding from the moment I 5 knew the loan, I should help Eastern to handle 6 everything. 7 Q From the first time you learned of 8 the loan, you believed it was your responsibility 9 to handle issues regarding the loan? 10 MS. CLINE: Objection to form. 11 A Yes. 12 Q And you first learned of the loan 13 sometime in 2018; right? 14 A Yes. 15 Q Possibly you learned of it for the 16 first time in your dinner with William Yu? 17 MS. CLINE: Asked and answered. 18 A I believe you asked this question 19 already. The answer is possibly. 20 Q So what has Eastern done, or what has 21 Eastern told you to make you believe that you have 22 authority on its behalf to deal with ACA regarding 23 the loan? 24 MS. CLINE: Objection to form. 25 She's already testified about her</p> <p style="text-align: right;">Page 64</p>
<p>1 YVETTE WANG 2 THE VIDEOGRAPHER: The time is 3 11:51 a.m., Wednesday, October 30, 4 2019. This is media number 2 of the 5 videotaped deposition of this event. 6 We're back on the record. 7 CONTINUED EXAMINATION 8 BY MR. GREIM: 9 Q Okay. I want to clear up a few 10 things from our last round of questions, and then 11 we'll move on to a new topic. Okay? 12 A (Nodding) 13 Q In your conversation with Guo Mei, 14 did she ask you to handle Eastern Profit's 15 interactions with ACA regarding the million dollar 16 loan? 17 A You mean our dinner? 18 Q Yes. 19 A She didn't specifically say the 20 details, but basically she said, "I don't know any 21 of this. Please handle all of this." 22 Q So is it Eastern Profit's position 23 that -- let me back up. 24 Is it Eastern Profit's position that 25 you are to handle negotiations or discussions with</p> <p style="text-align: right;">Page 63</p>	<p>1 YVETTE WANG 2 responsibilities. 3 A I will repeat my answer again. 4 Both Mr. Han and Miss Mei Guo told me 5 can you please handle everything, because we do 6 not know the details. 7 Q But those two conversations happened 8 in the summer and the late summer of 2019; right? 9 MS. CLINE: Objection to form. 10 A Yes. 11 Q So how did you get authority from 12 Eastern Profit before that time to deal with ACA 13 regarding the loan? 14 A What's your question? 15 Q How did you get authority from 16 Eastern Profit before your discussions with Guo 17 Mei and Han Chunguang to deal with ACA regarding 18 the loan? 19 A What I say before this conversation? 20 Q For example your fall, 2018 dinner 21 meeting with William Yu. 22 A In my understanding, that was a 23 dinner. It's not specifically about anything. 24 Q Well, you testified earlier that when 25 you said yes, I agree, that you were speaking on</p> <p style="text-align: right;">Page 65</p>

17 (Pages 62 to 65)

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<p>1 YVETTE WANG</p> <p>2 MS. CLINE: Objection. Eddie,</p> <p>3 you're taking that Power of Attorney,</p> <p>4 which has to do the authority granted</p> <p>5 to Golden Spring, and you're using it</p> <p>6 to misdirect the question to this</p> <p>7 witness who is sitting on behalf of</p> <p>8 Eastern Profit.</p> <p>9 So the Power of Attorney has to</p> <p>10 do with Golden Spring. You can ask</p> <p>11 about that later with respect to</p> <p>12 Golden Spring's authority.</p> <p>13 She's already answered your</p> <p>14 question about her role at Eastern</p> <p>15 Profit multiple times now.</p> <p>16 MR. GREIM: I'm asking for the</p> <p>17 basis of it, and I would ask for the</p> <p>18 speaking objections to stop.</p> <p>19 Q So here's my question. I'm going to</p> <p>20 ask it a third time. I haven't heard an answer</p> <p>21 yet.</p> <p>22 Is there any document that granted</p> <p>23 you authority to deal with William Yu on behalf of</p> <p>24 Eastern Profit relating to the ACA loan before</p> <p>25 your fall, 2018 dinner with William Yu?</p> <p style="text-align: right;">Page 70</p>	<p>1 YVETTE WANG</p> <p>2 words we said in that dinner to help you in here.</p> <p>3 Okay? William mentioned to me I heard you guys</p> <p>4 were cheated by liars, which means I will have to</p> <p>5 ask the loan to be paid back with interest. I</p> <p>6 remember I said yes, sadly, we were cheated, and</p> <p>7 I'm sorry about that.</p> <p>8 And I agree with you, since you guys</p> <p>9 have a law agreement, the borrower should pay you</p> <p>10 back, and we are in litigation right now trying to</p> <p>11 get that 1 million U.S. dollars from the liars</p> <p>12 back.</p> <p>13 Hopefully we can get the justice, and</p> <p>14 that 1 million U.S. dollars can be returned back</p> <p>15 to Eastern Profits with even any damage. So</p> <p>16 Eastern, as you said, you told me borrower can pay</p> <p>17 you back.</p> <p>18 Q Okay. My question --</p> <p>19 A That is precisely a hundred percent.</p> <p>20 No. Too much hundred percent. 99 percent of</p> <p>21 words we used in a conversation.</p> <p>22 Q That was not my question.</p> <p>23 My question is: Was there anyone</p> <p>24 from Eastern Profit who told you that you had</p> <p>25 authority to deal with William Yu on its behalf</p> <p style="text-align: right;">Page 72</p>
<p>1 YVETTE WANG</p> <p>2 A I don't remember that.</p> <p>3 Q Okay did someone from Eastern Profit</p> <p>4 tell you, before the fall, 2018 meeting, that you</p> <p>5 had authority to deal with William Yu on behalf of</p> <p>6 Eastern Profit relating to the ACU loan?</p> <p>7 MS. CLINE: Objection to form.</p> <p>8 A What's the question?</p> <p>9 Q Did someone from Eastern Profit tell</p> <p>10 you before your 2018 dinner meeting with William</p> <p>11 Yu that you had authority to deal with him on</p> <p>12 Eastern Profit's behalf regarding the ACA loan?</p> <p>13 MS. CLINE: Objection to form.</p> <p>14 A I don't remember that.</p> <p>15 Q So why do you believe that you did</p> <p>16 have authority to deal with Mr. Yu then?</p> <p>17 MS. CLINE: Asked and answered.</p> <p>18 A Did I believe? You're confusing me.</p> <p>19 Q On what basis does Eastern Profit</p> <p>20 claim that you had authority to deal with William</p> <p>21 Yu regarding the ACA loan at the fall, 2018</p> <p>22 meeting?</p> <p>23 A Eddie, I will repeat my reply for the</p> <p>24 fourth time for you.</p> <p>25 I tried to recall every inch of the</p> <p style="text-align: right;">Page 71</p>	<p>1 YVETTE WANG</p> <p>2 before you had that meeting? It's a yes or no.</p> <p>3 Someone did or someone didn't.</p> <p>4 MS. CLINE: Is not necessarily.</p> <p>5 Objection to form. Asked and</p> <p>6 answered.</p> <p>7 A I don't remember that.</p> <p>8 Q Now had the contract not terminated,</p> <p>9 how was Eastern Profit ever going to pay ACA back?</p> <p>10 A What's the question?</p> <p>11 Q If the contract had not been</p> <p>12 terminated and Strategic Vision had given Eastern</p> <p>13 Profit what it wanted, how was it ever going to</p> <p>14 repay the loan to ACA, or even make interest</p> <p>15 payments?</p> <p>16 A If they're not liars, we were not</p> <p>17 cheated, they're professional qualified</p> <p>18 investigation company. You're talking about if</p> <p>19 that is the scenario.</p> <p>20 Q How is Eastern Profit going to repay</p> <p>21 Strategic or ACA?</p> <p>22 A Which means if this contract with</p> <p>23 Strategic Vision, let's say, let's imagine work</p> <p>24 out, right, succeed by the end; right? Okay.</p> <p>25 Eastern Profit has bank account. And</p> <p style="text-align: right;">Page 73</p>

19 (Pages 70 to 73)

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<p>1 YVETTE WANG</p> <p>2 I heard there are assets. The bank account was</p> <p>3 frozen by Chinese Communist Party in Hong Kong.</p> <p>4 By Eastern believes if the corrupted CCP are taken</p> <p>5 down, they are -- there are assets. Nobody can</p> <p>6 take them.</p> <p>7 So the bank account will be unfrozen,</p> <p>8 and Eastern will back to their normal business.</p> <p>9 Q Which is what?</p> <p>10 A I heard again -- this is my obtain</p> <p>11 knowledge, like investment.</p> <p>12 Q You said that at your first</p> <p>13 deposition. What about investment management?</p> <p>14 A What do you mean investment</p> <p>15 management?</p> <p>16 Q Well I'm just trying to ask you, what</p> <p>17 do you mean investment? What is that? I don't</p> <p>18 understand what you mean by that.</p> <p>19 A It could be like the investment on</p> <p>20 the cars, which they already have right now, in</p> <p>21 any profitable investment.</p> <p>22 What's your question? Sorry.</p> <p>23 Q Are they a car dealership?</p> <p>24 MS. CLINE: Objection to form.</p> <p>25 Q You say investment in cars. They</p> <p style="text-align: right;">Page 74</p>	<p>1 YVETTE WANG</p> <p>2 You're asking her the nature of</p> <p>3 Eastern Profit's business. Fine.</p> <p>4 But beyond that, getting into the</p> <p>5 nature of investments and so forth I</p> <p>6 think goes beyond the appropriate</p> <p>7 scope. Again, I know the judge gave</p> <p>8 you seven hours. But we can get to</p> <p>9 the topics we agreed upon and are</p> <p>10 covered by the court's order, that</p> <p>11 would be the goal of this deposition.</p> <p>12 Q What more do you know about Eastern</p> <p>13 Profit's business?</p> <p>14 A Eastern is registered in 2011.</p> <p>15 Q Right.</p> <p>16 A In Hong Kong. They are operating</p> <p>17 from 2011 until they're their bank account was</p> <p>18 frozen.</p> <p>19 Q You said their business is</p> <p>20 investments, which was your answer in the last</p> <p>21 deposition, and also that they own cars.</p> <p>22 Now is this part of their business?</p> <p>23 Do they buy and sell cars, or do they just happen</p> <p>24 to own a company car?</p> <p>25 MS. CLINE: Again, objection.</p> <p style="text-align: right;">Page 76</p>
<p>1 YVETTE WANG</p> <p>2 invest in antique cars?</p> <p>3 A I didn't say that.</p> <p>4 Q Okay. How does one invest in cars?</p> <p>5 MS. CLINE: Objection.</p> <p>6 Q I just want to understand. I don't</p> <p>7 think we have to go far into this. I truly don't</p> <p>8 understand the investment business in cars. What</p> <p>9 do you know about this?</p> <p>10 MS. CLINE: Objection to form</p> <p>11 and mischaracterizes the testimony.</p> <p>12 Q Tell me where I'm wrong. So far we</p> <p>13 know that they own cars and that they do</p> <p>14 investments.</p> <p>15 What more can you tell me about the</p> <p>16 business of Eastern Profit?</p> <p>17 MS. CLINE: I'm going to lodge</p> <p>18 another objection having now brought</p> <p>19 up the opinion which says beyond the</p> <p>20 scope of this testimony is whether</p> <p>21 plaintiff has any independent</p> <p>22 financial identity.</p> <p>23 MR. GREIM: I'm not asking that.</p> <p>24 I'm asking what it does.</p> <p>25 MS. CLINE: Let me finish.</p> <p style="text-align: right;">Page 75</p>	<p>1 YVETTE WANG</p> <p>2 Beyond the scope.</p> <p>3 Q In other words, is this just as an</p> <p>4 asset that they happened to have, in which case I</p> <p>5 don't care about it whatsoever, or is it their</p> <p>6 business to own cars, to invest, buy and sell</p> <p>7 cars?</p> <p>8 A I believe their investment is not</p> <p>9 only buy and sell cars.</p> <p>10 Q Okay. Is that one of the</p> <p>11 investments? Do they make investments in cars?</p> <p>12 A Sorry. What's the question?</p> <p>13 Q Do they make investments in cars?</p> <p>14 MS. CLINE: Objection to form.</p> <p>15 A They own cars. It could come from</p> <p>16 investment.</p> <p>17 Q Let me ask it this way.</p> <p>18 Do they own a fleet of cars, or do</p> <p>19 they have a few company cars?</p> <p>20 MS. CLINE: Objection to form.</p> <p>21 A There's no difference in my</p> <p>22 understanding.</p> <p>23 Q Do they have one or two cars, or do</p> <p>24 they have many cars that they have bought as an</p> <p>25 investment?</p> <p style="text-align: right;">Page 77</p>

20 (Pages 74 to 77)

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<p>1 YVETTE WANG</p> <p>2 Q Have you discussed the loan document</p> <p>3 with any other representative of Eastern Profit?</p> <p>4 A I don't remember that.</p> <p>5 Q Have you asked them whether it is</p> <p>6 genuine?</p> <p>7 MS. CLINE: Objection.</p> <p>8 A Whether it is what?</p> <p>9 Q Whether it is genuine.</p> <p>10 MS. CLINE: Objection.</p> <p>11 A What do you mean genuine?</p> <p>12 Q Whether it is what it purports to be.</p> <p>13 A I still don't understand your</p> <p>14 question. Purport to be, you mean what?</p> <p>15 Q Is it a real loan document signed by</p> <p>16 ACA and Eastern Profit?</p> <p>17 MS. CLINE: Objection to form.</p> <p>18 A Okay. Back to your question. You</p> <p>19 answer my question.</p> <p>20 What is your question of this?</p> <p>21 Q Have you asked anyone at Eastern</p> <p>22 Profit whether it is genuine?</p> <p>23 MS. CLINE: Objection to form.</p> <p>24 A Why should I ask? I don't remember</p> <p>25 asking. This is a normal, normal business law</p> <p style="text-align: right;">Page 94</p>	<p>1 YVETTE WANG</p> <p>2 he actually signed it?</p> <p>3 MS. CLINE: Objection to form.</p> <p>4 A He told me.</p> <p>5 Q Okay.</p> <p>6 A Mm-hmm.</p> <p>7 Q When did he tell you this?</p> <p>8 A In our conversation.</p> <p>9 Q Which conversation?</p> <p>10 A The conversation in the lobby.</p> <p>11 Q This is the conversation at the end</p> <p>12 of the summer?</p> <p>13 A Yes.</p> <p>14 Q Did you have a copy of the loan</p> <p>15 agreement in front of you at the time?</p> <p>16 A You mean when I was talking with him;</p> <p>17 right?</p> <p>18 Q Yes.</p> <p>19 A Nope.</p> <p>20 Q Have you asked whether anyone</p> <p>21 witnessed his signature?</p> <p>22 A What's the question?</p> <p>23 Q Have you asked -- let me be clear.</p> <p>24 Have you asked Mr. Han whether anyone</p> <p>25 else was present when he signed it?</p> <p style="text-align: right;">Page 96</p>
<p>1 YVETTE WANG</p> <p>2 agreement.</p> <p>3 Q How do you know?</p> <p>4 MS. CLINE: Objection to form.</p> <p>5 A As a law agreement you have lender,</p> <p>6 you have borrower, you have term, you have</p> <p>7 interest and drafted, I believe, by lawyers, I</p> <p>8 believe. So this is what I believe.</p> <p>9 Q Why do you believe it was drafted by</p> <p>10 lawyers?</p> <p>11 A This is my guess.</p> <p>12 MS. CLINE: Don't guess.</p> <p>13 THE WITNESS: Okay.</p> <p>14 A Very simple. Mr. Han doesn't speak</p> <p>15 English and write English at all.</p> <p>16 Q Do you know whether Mr. Han actually</p> <p>17 signed it?</p> <p>18 A Yes.</p> <p>19 Q How?</p> <p>20 MS. CLINE: Objection to form.</p> <p>21 A You mean by pen?</p> <p>22 Q How do you know Mr. Han signed it?</p> <p>23 A Oh. Because I saw the law agreement.</p> <p>24 There was signature on there.</p> <p>25 Q Have you ever asked Mr. Han whether</p> <p style="text-align: right;">Page 95</p>	<p>1 YVETTE WANG</p> <p>2 A I didn't ask that.</p> <p>3 Q Have you asked Mr. Je or Yu whether</p> <p>4 anyone else was present when he signed it?</p> <p>5 A I did not ask that.</p> <p>6 Q How do you know Mr. Yu signed it?</p> <p>7 Let me step. Do you know Mr. Yu</p> <p>8 signed it?</p> <p>9 MS. CLINE: Objection to form.</p> <p>10 Object to the whole line of</p> <p>11 questioning.</p> <p>12 A So from the paper which Zack showed</p> <p>13 me. Z-A-C-K.</p> <p>14 MS. CLINE: I want to make sure</p> <p>15 you don't talk about anything that</p> <p>16 Zack told you, so be careful.</p> <p>17 THE WITNESS: Okay.</p> <p>18 A The law agreement was signed by both</p> <p>19 lender and borrower.</p> <p>20 (Wang Exhibit 31, a Loan</p> <p>21 Agreement Bates stamped</p> <p>22 Eastern-000278 to 280 previously</p> <p>23 marked for Identification as of this</p> <p>24 date.)</p> <p>25 Q I'm going to hand you what we're</p> <p style="text-align: right;">Page 97</p>

25 (Pages 94 to 97)

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<p>1 YVETTE WANG</p> <p>2 marking Wang 31. I have a blank one for you</p> <p>3 hand to your counsel next door.</p> <p>4 MS. CLINE: So the Notice of</p> <p>5 Deposition that you marked first,</p> <p>6 which was the exhibit number.</p> <p>7 MR. GREIM: 30. We started in</p> <p>8 the 30s for some reason. I'm not</p> <p>9 sure why.</p> <p>10 Q So let me ask you first. Have you</p> <p>11 seen this document before?</p> <p>12 A Yes.</p> <p>13 Q Is this the document Mr. Grendi</p> <p>14 (phonetic) showed you?</p> <p>15 A Yes.</p> <p>16 Q When he showed it to you, was it the</p> <p>17 first time you had seen it?</p> <p>18 MS. CLINE: Objection. Asked</p> <p>19 and answered.</p> <p>20 A The hard copy, yes.</p> <p>21 Q Well, had you seen it in some</p> <p>22 electronic version beforehand?</p> <p>23 A No.</p> <p>24 Q You qualified your answer was in hard</p> <p>25 copy. I'm just asking did you see it in some</p> <p style="text-align: right;">Page 98</p>	<p>1 YVETTE WANG</p> <p>2 MS. CLINE: Again, the same</p> <p>3 caution. I don't want you to testify</p> <p>4 about any conversations you had with</p> <p>5 Zack.</p> <p>6 Mr. Greim is trying to figure</p> <p>7 out if the first time you saw it is</p> <p>8 when Zack gave it to you or if there</p> <p>9 was another time.</p> <p>10 Q When you say from Zack's file, what</p> <p>11 do you mean Zack's file?</p> <p>12 A I don't remember that. Zack's file,</p> <p>13 I mean Zack showed me or not. What he tell me, I</p> <p>14 cannot remember that.</p> <p>15 Q I'm not asking you for right now what</p> <p>16 he told you. I'm asking when you say from Zack's</p> <p>17 file, what file are you referring to?</p> <p>18 A This agreement.</p> <p>19 Q Did he give it to you in person?</p> <p>20 A I don't remember that.</p> <p>21 Q Did he E-mail it to you?</p> <p>22 A I don't remember that.</p> <p>23 Q Was it part of a larger set of</p> <p>24 documents?</p> <p>25 MS. CLINE: That's a yes or no</p> <p style="text-align: right;">Page 100</p>
<p>1 YVETTE WANG</p> <p>2 other format before Mr. Grendi showed it to you?</p> <p>3 A I understand your question. I just a</p> <p>4 hundred percent tell you what did I see before.</p> <p>5 Q I don't think I understand your</p> <p>6 answer. I will ask you again.</p> <p>7 I understand that you had not seen --</p> <p>8 when you say in hard copy, are you telling me that</p> <p>9 this is the first time you saw the loan agreement</p> <p>10 in paper form?</p> <p>11 A Nope.</p> <p>12 Q Was it the first time you had seen a</p> <p>13 loan agreement at all?</p> <p>14 A No.</p> <p>15 Q When did you first see the loan</p> <p>16 agreement?</p> <p>17 A You mean this one?</p> <p>18 Q When did you first see a loan</p> <p>19 agreement between ACA and Eastern Profit?</p> <p>20 A I don't remember that.</p> <p>21 Q But it was sometime before Mr. Grendi</p> <p>22 showed you what we've marked as Wong Exhibit 31?</p> <p>23 A I don't remember that. I saw this</p> <p>24 agreement from Zack's file.</p> <p>25 Q From his file, what do you mean?</p> <p style="text-align: right;">Page 99</p>	<p>1 YVETTE WANG</p> <p>2 question. I don't want to get into</p> <p>3 which documents Mr. Grendi might have</p> <p>4 given you.</p> <p>5 A Yes.</p> <p>6 Q Were the other documents drafts of</p> <p>7 the loan agreement?</p> <p>8 A Sorry. What's the question?</p> <p>9 Q Were the other documents drafts of</p> <p>10 the loan agreement?</p> <p>11 A I don't understand the question.</p> <p>12 MS. CLINE: It's just a yes or</p> <p>13 no question.</p> <p>14 Q I will be clear.</p> <p>15 Do you understand the idea of a draft</p> <p>16 of a document, what a draft is?</p> <p>17 A Draft to me which means a draft</p> <p>18 without signature. Am I right?</p> <p>19 Q Yes. Yes.</p> <p>20 So were the other documents drafts of</p> <p>21 this loan agreement?</p> <p>22 A No. What I see from Zack or saw from</p> <p>23 Zack.</p> <p>24 MS. CLINE: I don't want you</p> <p>25 to -- he's only asking about the loan</p> <p style="text-align: right;">Page 101</p>

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<p>1 YVETTE WANG</p> <p>2 agreement. If the documents were</p> <p>3 something other than versions of the</p> <p>4 loan agreement, I don't want you to</p> <p>5 answer the question.</p> <p>6 A I never saw any draft of this</p> <p>7 agreement. When I saw it, it's a completed</p> <p>8 agreement already finished.</p> <p>9 Q You testified at your first</p> <p>10 deposition that you first heard of ACA after a</p> <p>11 liar went from ACA to Strategic Vision. Do you</p> <p>12 recall that?</p> <p>13 A I don't remember that.</p> <p>14 Q Let's take me a second. I will point</p> <p>15 you to that, because I want to be very clear about</p> <p>16 this.</p> <p>17 Here we go. I'm going to slide over</p> <p>18 to you a final copy of your deposition from</p> <p>19 January 31, 2019.</p> <p>20 A Yes.</p> <p>21 Q I don't have a whole bunch of print</p> <p>22 offs of these, but I assume that everybody -- let</p> <p>23 me ask you.</p> <p>24 Did you review your old testimony in</p> <p>25 preparation for today?</p> <p style="text-align: right;">Page 102</p>	<p>1 YVETTE WANG</p> <p>2 read it.</p> <p>3 MR. GREIM: But I don't want to</p> <p>4 loose my spot.</p> <p>5 Q Did I read the first few lines</p> <p>6 correctly?</p> <p>7 A Yes.</p> <p>8 Q Let's take a pause. Read through</p> <p>9 whatever you need to read there on that page to</p> <p>10 see what else to get context.</p> <p>11 A You want me to read until which page?</p> <p>12 Q There's a long discussion about why</p> <p>13 the money was wired, which is not what my question</p> <p>14 is about.</p> <p>15 I'm asking you about the answer you</p> <p>16 gave on lines 20 through -- question and answer on</p> <p>17 lines 20 through 23.</p> <p>18 Have you had a chance to get to</p> <p>19 line 20 to 23 yet on page 40?</p> <p>20 A Yes, I'm here.</p> <p>21 Q So the attorney asked you prior to</p> <p>22 them wiring a million dollars to Strategic Vision,</p> <p>23 you had never heard of ACA Capital. Answer: No,</p> <p>24 I didn't.</p> <p>25 Did I read that right?</p> <p style="text-align: right;">Page 104</p>
<p>1 YVETTE WANG</p> <p>2 A I didn't.</p> <p>3 Q Look at page 40, please. Are you</p> <p>4 there yet?</p> <p>5 A Page 40, right?</p> <p>6 Q Mm-hmm.</p> <p>7 A Yes, I'm here.</p> <p>8 Q So look at line 6. You see there's a</p> <p>9 que there. That's the question of the other</p> <p>10 lawyer, it wasn't me, who was asking you</p> <p>11 questions.</p> <p>12 You see it says: The entity ACA</p> <p>13 Capital Group Limited, are you with that?</p> <p>14 Answer: I heard this name.</p> <p>15 Question: How did you hear this</p> <p>16 name?</p> <p>17 Answer, from this project.</p> <p>18 MS. CLINE: Let me just</p> <p>19 interrupt. The witness needs a</p> <p>20 minute to read some more of the</p> <p>21 transcript for context.</p> <p>22 You should feel free.</p> <p>23 MR. GREIM: Let's do that.</p> <p>24 Q So far did I read it correctly?</p> <p>25 MS. CLINE: Give her a minute to</p> <p style="text-align: right;">Page 103</p>	<p>1 YVETTE WANG</p> <p>2 A Correct.</p> <p>3 Q So you recall now testifying at your</p> <p>4 first deposition that you had not heard of ACA</p> <p>5 before the wire went to Strategic Vision?</p> <p>6 A You're repeating what we said here;</p> <p>7 right?</p> <p>8 Q Correct. Do you recall testifying to</p> <p>9 that at your first deposition?</p> <p>10 A Yes.</p> <p>11 Q Is that true? I mean is it true that</p> <p>12 you had not learned -- you have not heard of ACA</p> <p>13 capital until the money was wired to Strategic</p> <p>14 Vision?</p> <p>15 A Correct.</p> <p>16 Q That's all I wanted to ask you.</p> <p>17 So now I'm going to come back to this</p> <p>18 agreement. When is the first time that you sought</p> <p>19 any kind of writing, not necessarily Exhibit 31,</p> <p>20 but any kind of writing that contained the terms</p> <p>21 of the loan agreement?</p> <p>22 MS. CLINE: Asked and answered.</p> <p>23 A You mean any draft without any</p> <p>24 signature?</p> <p>25 Q Sure.</p> <p style="text-align: right;">Page 105</p>

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<p>1 YVETTE WANG</p> <p>2 MS. CLINE: Objection. Again,</p> <p>3 she's sitting here in her capacity as</p> <p>4 a representative of 30(b)(6) -- a</p> <p>5 30(b)(6) representative for Eastern</p> <p>6 Profit.</p> <p>7 You have yet to ask a single</p> <p>8 question about the contract that is</p> <p>9 the subject of this lawsuit.</p> <p>10 Now you're again asking</p> <p>11 questions about Mr. Je and ACA, which</p> <p>12 is specifically not within the scope</p> <p>13 of this deposition.</p> <p>14 So if we can just get to what</p> <p>15 we're actually litigating, that would</p> <p>16 be amazing.</p> <p>17 Q Did you ask Mr. Je about whether he</p> <p>18 signed this purported loan agreement from ACA to</p> <p>19 Eastern Profit?</p> <p>20 MS. CLINE: Objection to form.</p> <p>21 A He told me he signed.</p> <p>22 Q When did he tell you that?</p> <p>23 A I don't remember that.</p> <p>24 Q Was it in 2019?</p> <p>25 A I believe it was in 2018. The</p> <p style="text-align: right;">Page 110</p>	<p>1 YVETTE WANG</p> <p>2 understand he's talking about ACA.</p> <p>3 Q But you didn't see this loan</p> <p>4 agreement until sometime in 2019 when Mr. Grendi</p> <p>5 gave it to you; correct?</p> <p>6 A I don't remember the time. Again, I</p> <p>7 told you I don't remember first time agreement.</p> <p>8 Q You testified at your deposition that</p> <p>9 you had asked for a copy of the loan agreement and</p> <p>10 hadn't gotten one.</p> <p>11 Do you remember that?</p> <p>12 MS. CLINE: Objection to form.</p> <p>13 Again if you want to show her</p> <p>14 testimony.</p> <p>15 MR. GREIM: We will.</p> <p>16 Q Turn to page 45, please. Are you</p> <p>17 there?</p> <p>18 A 45, yes.</p> <p>19 Q You see line 8 there is a question</p> <p>20 from the lawyer. He says: Is there documentation</p> <p>21 to support this loan? Answer: I requested there</p> <p>22 should be some documents. Question: Have you</p> <p>23 ever seen the documents supporting this loan</p> <p>24 answer? Answer: I didn't see that. Question:</p> <p>25 You did not see it? Answer: No.</p> <p style="text-align: right;">Page 112</p>
<p>1 YVETTE WANG</p> <p>2 dinner, that should be the first time he clearly</p> <p>3 told me, yes.</p> <p>4 Q So how did this come up that he</p> <p>5 signed it? Did you ask him or did he just</p> <p>6 volunteer that information?</p> <p>7 A He told me.</p> <p>8 MS. CLINE: Objection to form.</p> <p>9 A He told me we sign a loan agreement.</p> <p>10 We had a loan agreement.</p> <p>11 Q So he told you two things. One, that</p> <p>12 there was a loan agreement, and two, that he had</p> <p>13 been the signer on behalf of the ACA?</p> <p>14 MS. CLINE: Objection to form.</p> <p>15 A You remember my first deposition in</p> <p>16 January, 2019, I said I even didn't hear about ACA</p> <p>17 company. My dinner with William was by light</p> <p>18 2018, that dinner. William just told me they sign</p> <p>19 a loan agreement. He didn't even mention to me</p> <p>20 what company.</p> <p>21 Q What company he signed on behalf of?</p> <p>22 A Yes.</p> <p>23 Q Did you understand that it was ACA,</p> <p>24 or did you think it was maybe a different company?</p> <p>25 A When I saw this loan agreement and</p> <p style="text-align: right;">Page 111</p>	<p>1 YVETTE WANG</p> <p>2 Did I read that correctly?</p> <p>3 A Yes.</p> <p>4 Q Now do you recall testifying at your</p> <p>5 deposition that you had not seen a copy of the</p> <p>6 loan agreement?</p> <p>7 MS. CLINE: Objection to the</p> <p>8 form.</p> <p>9 A And you're helping yourself to answer</p> <p>10 your own question. By January, my first</p> <p>11 deposition, I testify I didn't see the law</p> <p>12 agreement which you're helping yourself. I saw</p> <p>13 this law agreement after my first deposition.</p> <p>14 Q Good. And so -- but you cannot tell</p> <p>15 us today when that was. Was it soon after the</p> <p>16 deposition, was it recently before Mr. Grendi left</p> <p>17 the case?</p> <p>18 A I don't remember.</p> <p>19 MS. CLINE: Objection to form.</p> <p>20 A I don't remember that.</p> <p>21 Q Once you got the loan document, did</p> <p>22 you question Mr. Han Chunguang about it?</p> <p>23 A Question?</p> <p>24 Q Did you ask him questions about the</p> <p>25 document?</p> <p style="text-align: right;">Page 113</p>

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<p>1 YVETTE WANG</p> <p>2 Q What, if any, was Guo Wengui's</p> <p>3 involvement in the discussion of the loan,</p> <p>4 negotiation of the loan?</p> <p>5 A I'm not quite clear about his role in</p> <p>6 this discussion.</p> <p>7 Q Well, was he acting as Eastern</p> <p>8 Profits' agent in connection with the loan</p> <p>9 negotiation?</p> <p>10 A Correct.</p> <p>11 Q Was he acting as Eastern Profit's</p> <p>12 agent -- let me strike that.</p> <p>13 Has he been the acting as Eastern</p> <p>14 Profit's agent in connection with discussions with</p> <p>15 ACA regarding payment or a collection of the loan?</p> <p>16 A I heard William mention to be paid</p> <p>17 back to Mr. Guo also.</p> <p>18 Q Where did you hear that?</p> <p>19 A From William.</p> <p>20 Q When did he tell you this?</p> <p>21 A I forgot the precise words, but my</p> <p>22 impression is he's chasing everyone he can chase.</p> <p>23 Q My question was when did William Je</p> <p>24 mention to you that he had talked to Guo about</p> <p>25 paying back the loan?</p> <p style="text-align: right;">Page 126</p>	<p>1 YVETTE WANG</p> <p>2 agent of Eastern Profit with respect to the loan?</p> <p>3 A I said Mr. Guo acted as an agent on</p> <p>4 behalf of Eastern Profit to talk with Strategic</p> <p>5 Vision and Waller and Wallop. W-A-L-L-E-R and</p> <p>6 W-A-L-L-O-P.</p> <p>7 Q I'm sorry. My question is about the</p> <p>8 loan, not about the discussions with Strategic</p> <p>9 Vision. I will be very clear.</p> <p>10 In fact, let me take a second.</p> <p>11 Does Mr. Guo have any E-mails or</p> <p>12 texts that he sent to Mr. Ye or anyone else on</p> <p>13 Eastern Profit's behalf in connection with the</p> <p>14 loan?</p> <p>15 A I don't believe so.</p> <p>16 Q Did Eastern Profit check for those</p> <p>17 E-mails or texts before the deposition today?</p> <p>18 MS. CLINE: Again, that was not</p> <p>19 a subject of the depo notice.</p> <p>20 If you know the answer, you may</p> <p>21 respond.</p> <p>22 A I asked about the loan agreement. I</p> <p>23 was advised they were our discussion.</p> <p>24 So I didn't change further and say</p> <p>25 let me search your E-mail or search your texts,</p> <p style="text-align: right;">Page 128</p>
<p>1 YVETTE WANG</p> <p>2 A Should be quite a long time. 2018.</p> <p>3 Q Is this in the 2018 dinner?</p> <p>4 A Yes. In a dinner he mentioned to me</p> <p>5 also, yeah.</p> <p>6 Q In a dinner or the dinner that we</p> <p>7 discussed earlier?</p> <p>8 A I believe we were talking about their</p> <p>9 dinner. I'm ready to tell you where is the</p> <p>10 restaurant.</p> <p>11 Q Where is the restaurant?</p> <p>12 A Avra.</p> <p>13 Q Spell that for the record.</p> <p>14 A A-V-R-A. It's a great seafood</p> <p>15 restaurant.</p> <p>16 Q Well, other than Guo and other than</p> <p>17 Han Chunguang, who else was involved in</p> <p>18 negotiation of the ACA Eastern Profit loan?</p> <p>19 A Mei is aware of this loan also.</p> <p>20 Q Well, you say she is aware. My</p> <p>21 question is who was involved in the negotiation of</p> <p>22 the loan?</p> <p>23 A Oh. Negotiation. William, Mr. Han.</p> <p>24 Yeah.</p> <p>25 Q You said Mr. Guo also acted as the</p> <p style="text-align: right;">Page 127</p>	<p>1 YVETTE WANG</p> <p>2 because I believe I was told the truth.</p> <p>3 Q Did you ask Mr. Guo that question?</p> <p>4 A I didn't ask him. I don't remember</p> <p>5 that.</p> <p>6 Q Now the research agreement called for</p> <p>7 a fee of \$750,000 a month; is that right?</p> <p>8 MS. CLINE: Objection to form.</p> <p>9 A \$750,000, U.S. dollars, based on</p> <p>10 their weekly reports and general monthly reports.</p> <p>11 Without seeing or received the reports, \$750,000</p> <p>12 U.S. dollars should not be paid.</p> <p>13 Q What steps, if any, did Eastern</p> <p>14 Profit take to raise the money for the first</p> <p>15 \$750,000 payment to Strategic Vision?</p> <p>16 MS. CLINE: Objection to form.</p> <p>17 A Sorry. What's the question? Raised</p> <p>18 the money?</p> <p>19 Q Sure.</p> <p>20 A What's the question?</p> <p>21 Q What steps, if any, did Eastern</p> <p>22 Profit take to raise the money for the first</p> <p>23 \$750,000 payment to Strategic Vision?</p> <p>24 MS. CLINE: So hold your answer</p> <p>25 for a minute. Again, the Judge has</p> <p style="text-align: right;">Page 129</p>

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<p>1 YVETTE WANG</p> <p>2 the very back.</p> <p>3 A Which page?</p> <p>4 Q Page 3. Was Chu -- do you see</p> <p>5 Chunguang Han's signature? Do you see it?</p> <p>6 A I see a signature behind Chunguang</p> <p>7 Han's name.</p> <p>8 Q Is that his signature?</p> <p>9 MS. CLINE: Objection.</p> <p>10 Foundation.</p> <p>11 A This is a accurate, as you said, true</p> <p>12 loan agreement. Of course this is his signature.</p> <p>13 What do you mean, like someone made up? I don't</p> <p>14 understand your question.</p> <p>15 Q I'm asking Eastern Profit if this is</p> <p>16 really its director's signature.</p> <p>17 A I'm telling you this is a true loan</p> <p>18 agreement. So the signature on this loan</p> <p>19 agreement, they are accurate and true.</p> <p>20 Q And how do you know that this is a</p> <p>21 true loan agreement; did someone tell you this?</p> <p>22 MS. CLINE: Objection. Asked</p> <p>23 and answered. You're badgering the</p> <p>24 witness. You asked her about the</p> <p>25 signature. She answered the</p> <p style="text-align: right;">Page 138</p>	<p>1 YVETTE WANG</p> <p>2 Q Whose name is it?</p> <p>3 A It's a signature.</p> <p>4 Q Of who?</p> <p>5 A It could be a (inaudible) or any</p> <p>6 symbolic.</p> <p>7 Q Let's go ahead and get it out. We</p> <p>8 have it.</p> <p>9 A Let's get it.</p> <p>10 (Wang Exhibit 2, Research</p> <p>11 Agreement dated December 29, 2017</p> <p>12 Bates stamped Eastern-000005 to</p> <p>13 Eastern 000009 previously marked for</p> <p>14 Identification as of this date.)</p> <p>15 Q I'm going to show you what we marked</p> <p>16 in your first deposition as Wong 2.</p> <p>17 Do you recognize this document? The</p> <p>18 question pending is whether you recognize the</p> <p>19 document.</p> <p>20 A I'm preparing to answer your</p> <p>21 question.</p> <p>22 Q Just making sure.</p> <p>23 A Yes.</p> <p>24 Q What is it?</p> <p>25 A It's called a Research Agreement.</p> <p style="text-align: right;">Page 140</p>
<p>1 YVETTE WANG</p> <p>2 question.</p> <p>3 Q Other than Mr. Grendi, has anyone</p> <p>4 else told you this is Mr. Chunguang Han's</p> <p>5 signature?</p> <p>6 MS. CLINE: Objection to form.</p> <p>7 Mischaracterizes testimony.</p> <p>8 Q Did you sign Chunguang Han's</p> <p>9 signature on the research agreement in this case?</p> <p>10 A Pardon?</p> <p>11 Q Did you sign Chunguang Han's</p> <p>12 signature on the research agreement at issue in</p> <p>13 this case?</p> <p>14 A How I can sign his signature?</p> <p>15 Q Do you sign his name to the research</p> <p>16 agreement in this case?</p> <p>17 A You're confusing me. Which</p> <p>18 agreement?</p> <p>19 Q The research agreement at issue in</p> <p>20 this case.</p> <p>21 A That is a signature I was authorized</p> <p>22 to sign.</p> <p>23 Q So you were authorized to write his</p> <p>24 name on that document?</p> <p>25 A I don't believe that's his name.</p> <p style="text-align: right;">Page 139</p>	<p>1 YVETTE WANG</p> <p>2 Q It's an agreement that you signed in</p> <p>3 French Wallop's presence; isn't it?</p> <p>4 A Yes.</p> <p>5 Q And whose name did you sign?</p> <p>6 A I didn't. I did not mean to sign</p> <p>7 anyone's name here.</p> <p>8 Q Did you sign any name?</p> <p>9 A Are you Chinese Mandarin,</p> <p>10 linguistics? Do you read Mandarin?</p> <p>11 Q Answer the question. Whose name did</p> <p>12 you sign?</p> <p>13 A I didn't sign anyone's name. This is</p> <p>14 a signature.</p> <p>15 Q What does it read?</p> <p>16 A It's simple.</p> <p>17 Q So this is not a name? I'm</p> <p>18 indicating the Chinese handwriting on page 3.</p> <p>19 MS. CLINE: Objection to form.</p> <p>20 A It could be a name.</p> <p>21 Q What is it? Whose name is this?</p> <p>22 A I am authorized to sign this contract</p> <p>23 on behalf of Eastern Profit Limited. I sign here.</p> <p>24 This is my signature on behalf of Eastern Profit</p> <p>25 Limited.</p> <p style="text-align: right;">Page 141</p>

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October 30, 2019

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<p>1 YVETTE WANG</p> <p>2 Q Fair enough.</p> <p>3 A I can say this is my name. I can say</p> <p>4 this is in my English name or Chinese name, and</p> <p>5 this is my authorized signature here.</p> <p>6 (Indicating)</p> <p>7 Q My question is whose name is it?</p> <p>8 A Nobody's name.</p> <p>9 Q So a Mandarin speaker would look at</p> <p>10 this and say this is just squiggly lines, it's no</p> <p>11 one's name. Does it make out a name?</p> <p>12 A I don't know think any Mandarin say</p> <p>13 this name.</p> <p>14 Q This is Han Chunguang's name; isn't</p> <p>15 it?</p> <p>16 A I didn't say that.</p> <p>17 Q I'm asking you. Is this Han</p> <p>18 Chunguang's name?</p> <p>19 A I didn't say that. I don't think it</p> <p>20 is.</p> <p>21 Q Okay. So your testimony under oath</p> <p>22 is that you did not sign Han Chunguang's name?</p> <p>23 A Correct.</p> <p>24 Q You signed -- did you sign any name?</p> <p>25 MS. CLINE: Objection. Asked</p> <p style="text-align: right;">Page 142</p>	<p>1 YVETTE WANG</p> <p>2 Q What date was that signed?</p> <p>3 A You mean as Power of Attorney?</p> <p>4 Q Yes.</p> <p>5 MS. CLINE: Just to be clear, is</p> <p>6 your line of inquiry -- this is the</p> <p>7 Eastern Profit 30(b)(6). Your line</p> <p>8 of inquiry, am I correct, relates to</p> <p>9 your authority on behalf of Eastern</p> <p>10 Profit.</p> <p>11 MR. GREIM: Correct.</p> <p>12 A What's your question?</p> <p>13 Q When was the limited Power of</p> <p>14 Attorney signed?</p> <p>15 A You went me to read this; right?</p> <p>16 Q Just answer the question.</p> <p>17 A I need to know the question. What</p> <p>18 was the question?</p> <p>19 Q The question is: When was the</p> <p>20 limited Power of Attorney signed? When was it</p> <p>21 signed?</p> <p>22 A August 30, 2018.</p> <p>23 Q Right. So my question is how did you</p> <p>24 get your authority; was it orally, or was it in</p> <p>25 writing, on or before January 6, 2018 to affix</p> <p style="text-align: right;">Page 144</p>
<p>1 YVETTE WANG</p> <p>2 and answered.</p> <p>3 A I repeat again. I didn't mean to be</p> <p>4 anyone's name. I was authorized to sign on</p> <p>5 Eastern Profits, and I just sign that.</p> <p>6 Q Who authorized you to sign this</p> <p>7 agreement on behalf of Eastern Profit?</p> <p>8 A Eastern Profit.</p> <p>9 Q Who?</p> <p>10 A Is both May, M-E-I, and Mr. Han.</p> <p>11 Q So Guo Mei and Mr. Han authorized you</p> <p>12 sometime before January 6th or on January 6th to</p> <p>13 sign something on this line?</p> <p>14 MS. CLINE: Objection to form.</p> <p>15 A They authorized me to handle this</p> <p>16 research project with everything this project</p> <p>17 needs Eastern to do.</p> <p>18 Q How did they authorize you to handle</p> <p>19 this project on or before January 6th?</p> <p>20 MS. CLINE: Objection. Asked</p> <p>21 and answered.</p> <p>22 A How?</p> <p>23 Q By what method did they give this</p> <p>24 authorization to you?</p> <p>25 A You have a limited Power of Attorney.</p> <p style="text-align: right;">Page 143</p>	<p>1 YVETTE WANG</p> <p>2 something to exhibit number 2, the research</p> <p>3 screen?</p> <p>4 A You should ask me these questions</p> <p>5 from the very beginning. I will give you what you</p> <p>6 need to know and what you want to know.</p> <p>7 Q Great. I can't wait to hear it.</p> <p>8 MS. CLINE: I object. Please</p> <p>9 don't stare her down. You can ask a</p> <p>10 question, and she can answer it. The</p> <p>11 stipulation is the stares we can do</p> <p>12 without.</p> <p>13 MR. GREIM: Okay. But she's</p> <p>14 making a funny face at me. That's</p> <p>15 okay.</p> <p>16 Q I would just like to know the answer</p> <p>17 to the question.</p> <p>18 How did you get the authority to sign</p> <p>19 Exhibit 2?</p> <p>20 MS. CLINE: When you say</p> <p>21 Exhibit 2, you mean --</p> <p>22 MR. GREIM: The research</p> <p>23 agreement.</p> <p>24 MS. CLINE: -- Wang Exhibit 2.</p> <p>25 You have two exhibits with the</p> <p style="text-align: right;">Page 145</p>

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<p>1 YVETTE WANG</p> <p>2 number 2 on them.</p> <p>3 THE WITNESS: Can I answer?</p> <p>4 MS. CLINE: Yes.</p> <p>5 A I was authorized both by orally and</p> <p>6 Power of Attorney.</p> <p>7 Q What was the first word?</p> <p>8 A Orally. O-R-A-L-L-Y.</p> <p>9 Q So is there another Power of Attorney</p> <p>10 that predates Guo Exhibit 2?</p> <p>11 MS. CLINE: Again, the questions</p> <p>12 that have to do with Golden Spring</p> <p>13 and Golden Spring's authority are for</p> <p>14 a separate deposition.</p> <p>15 MR. GREIM: I agree.</p> <p>16 MS. CLINE: Right now we're</p> <p>17 talking about Eastern Profit.</p> <p>18 MR. GREIM: Yup. That's exactly</p> <p>19 right.</p> <p>20 Q So the question is -- first of all,</p> <p>21 Exhibit 2, Wang Exhibit 2, the Research Agreement</p> <p>22 was signed by Eastern Profit; right?</p> <p>23 A Correct.</p> <p>24 Q So you've just testified that you</p> <p>25 received the authority to sign by Eastern Profit</p> <p style="text-align: right;">Page 146</p>	<p>1 YVETTE WANG</p> <p>2 MS. CLINE: Objection to form.</p> <p>3 Mischaracterizes the document.</p> <p>4 THE WITNESS: Should I answer?</p> <p>5 MS. CLINE: You can answer.</p> <p>6 A I don't remember the dates. 80</p> <p>7 percent. Again, she doesn't want me to guess.</p> <p>8 I sign this research agreement based</p> <p>9 on a firm, confirmative, very firm, F-I-R-M, oral</p> <p>10 authorization.</p> <p>11 Q From who?</p> <p>12 A From Mr. Han.</p> <p>13 Q When did he give you the oral</p> <p>14 authorization to sign the research agreement?</p> <p>15 A December, 2017.</p> <p>16 Q Okay. When in December of 2017? A</p> <p>17 lot of negotiations in that month.</p> <p>18 When in December of 2017 did Mr. Han</p> <p>19 give you this authority?</p> <p>20 A I don't remember the dates, but it</p> <p>21 was before we entered into this research</p> <p>22 agreement.</p> <p>23 Q So did you discuss with Mr. Han the</p> <p>24 terms of the research agreement?</p> <p>25 A Nope.</p> <p style="text-align: right;">Page 148</p>
<p>1 YVETTE WANG</p> <p>2 from two different sources, orally and by limited</p> <p>3 Power of Attorney.</p> <p>4 So my first question is what is the</p> <p>5 limited Power of Attorney that authorized you to</p> <p>6 sign the research agreement for Eastern Profit?</p> <p>7 MS. CLINE: Objection to form.</p> <p>8 A I have to correct my linguistic or</p> <p>9 your understanding. I told you orally or Power of</p> <p>10 Attorney.</p> <p>11 Q Okay. So is it your testimony that</p> <p>12 there is a Power of Attorney that granted you the</p> <p>13 authority to sign Wang Exhibit 2, or are you</p> <p>14 saying there is no limited Power of Attorney?</p> <p>15 Which one is it?</p> <p>16 A I repeat again. I was authorized by</p> <p>17 eastern both orally and Power of Attorney.</p> <p>18 Q I see. And so we just looked at one</p> <p>19 Power of Attorney, but it mentions Golden Spring,</p> <p>20 and it's from later in the year.</p> <p>21 MS. CLINE: Objection to form.</p> <p>22 Q So my question is is there some other</p> <p>23 Power of Attorney that I haven't seen yet that</p> <p>24 gave you the authority to sign the research</p> <p>25 agreement on behalf of Eastern Property?</p> <p style="text-align: right;">Page 147</p>	<p>1 YVETTE WANG</p> <p>2 Q Did you translate it for him?</p> <p>3 A He didn't ask. I don't remember I</p> <p>4 offered.</p> <p>5 Q Did you talk to Mr. Chunguang about</p> <p>6 the deal with Strategic Vision?</p> <p>7 A Yes, I did.</p> <p>8 Q Did he give you approval that he</p> <p>9 agreed with the deal?</p> <p>10 A He authorized me to deal with this</p> <p>11 deal. But he is aware we're trying to disclosure</p> <p>12 the Chinese corrupted official by investigation.</p> <p>13 And he is on same page with us, which means he</p> <p>14 agree with what we are doing.</p> <p>15 Q So how did you know that that was the</p> <p>16 purpose of the research agreement?</p> <p>17 MS. CLINE: I'm sorry. I was</p> <p>18 coughing. Can I hear that back.</p> <p>19 (The requested portion of the</p> <p>20 record was read back by the</p> <p>21 reporter.)</p> <p>22 MS. CLINE: Objection to form.</p> <p>23 A How did I know? I don't remember</p> <p>24 that clearly, but I heard -- this is about Chinese</p> <p>25 corrupted official. They're illegal like</p> <p style="text-align: right;">Page 149</p>

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<p>1 YVETTE WANG</p> <p>2 investigation from Miles and from Wallop, Waller.</p> <p>3 Both.</p> <p>4 I don't remember like which dates,</p> <p>5 the precise language, but Miles is looking for</p> <p>6 some professional company, and Waller, Wallop</p> <p>7 represented themselves, the best research company,</p> <p>8 professional qualified who can help our research.</p> <p>9 So I got to know about this research from there.</p> <p>10 Q Why did you -- what made you</p> <p>11 understand that Mr. Han was the person to go to</p> <p>12 for authority to sign the research agreement?</p> <p>13 MS. CLINE: Objection to form.</p> <p>14 A What's the question?</p> <p>15 Q How did you come to understand that</p> <p>16 Mr. Han was the person for you to go to to seek</p> <p>17 authority to sign the research agreement?</p> <p>18 MS. CLINE: Objection to form.</p> <p>19 A Because Waller and Wallop, obviously</p> <p>20 they did not want Mile's name on any of the</p> <p>21 contracts.</p> <p>22 Q I'm sorry?</p> <p>23 A I didn't finish.</p> <p>24 Q Okay. Go ahead.</p> <p>25 A And Miles, he expressed okay. Let's</p> <p style="text-align: right;">Page 150</p>	<p>1 YVETTE WANG</p> <p>2 How did you know Mr. Han was the person to go to</p> <p>3 to get authority from Eastern Profit?</p> <p>4 MS. CLINE: Objection to form.</p> <p>5 A I started to ask and look for someone</p> <p>6 as I just said. It was Mr. Han. He mentioned to</p> <p>7 me Eastern Profit could be on the contract.</p> <p>8 Q This is Chunguang Han?</p> <p>9 A Mr. Han.</p> <p>10 Q Han Chunguang; right?</p> <p>11 A Correct. He gave me Eastern Profit's</p> <p>12 name.</p> <p>13 Q So the person who suggested Eastern</p> <p>14 Profit to take Mr. Guo's place was Han Chunguang?</p> <p>15 MS. CLINE: Objection to form.</p> <p>16 A What do you mean take Mr. Guo's</p> <p>17 place?</p> <p>18 Q Who was the first person who</p> <p>19 mentioned Eastern Profit to you?</p> <p>20 A I don't remember clearly. It could</p> <p>21 be either Mr. Han or Mr. Guo, but I don't remember</p> <p>22 that clearly.</p> <p>23 Q You remember testifying at your first</p> <p>24 deposition it was Mr. Guo?</p> <p>25 A You want me to read the page? Which</p> <p style="text-align: right;">Page 152</p>
<p>1 YVETTE WANG</p> <p>2 look for someone who can be on this contract</p> <p>3 pursuing the same goal with us. I didn't finish.</p> <p>4 Q Okay. Keep going.</p> <p>5 A So I start to look for, and I asked</p> <p>6 Mr. Han. He was onboard. That's it.</p> <p>7 Q Okay. But my question unfortunately</p> <p>8 was: How did you know that Mr. Han was the right</p> <p>9 person to speak with to obtain Eastern Profit's</p> <p>10 authority?</p> <p>11 MS. CLINE: Objection to form.</p> <p>12 A Okay. I'm still confused by you.</p> <p>13 Q We know that at some point you</p> <p>14 identified Eastern Profit. We know that.</p> <p>15 A Mm-hmm.</p> <p>16 Q You had to go to a real person though</p> <p>17 to speak on behalf of Eastern Profit to give you</p> <p>18 authority; right?</p> <p>19 MS. CLINE: Objection to the</p> <p>20 form.</p> <p>21 A Continue.</p> <p>22 Q You agree with me so far; right?</p> <p>23 A I heard you so far.</p> <p>24 Q Okay. Fine. My question is why did</p> <p>25 you go to Mr. Han? Why not some other person?</p> <p style="text-align: right;">Page 151</p>	<p>1 YVETTE WANG</p> <p>2 page?</p> <p>3 Q Before we go back and do this, why</p> <p>4 don't we do it the right way. I'm just going to</p> <p>5 ask you. You remember testifying before that you</p> <p>6 first heard the words Eastern Profit from Mr. Guo?</p> <p>7 A You're asking me is that my testimony</p> <p>8 in my first deposition?</p> <p>9 Q Yes. Yes.</p> <p>10 MS. CLINE: He's asking whether</p> <p>11 you remember.</p> <p>12 A I don't remember that.</p> <p>13 Q All right. Look at page 12, please,</p> <p>14 of your transcript.</p> <p>15 A 12, right.</p> <p>16 Q Yes. Let's look at page 10. Even</p> <p>17 better, it's all over these pages.</p> <p>18 Let's start on 10. Why don't you</p> <p>19 just take a look at pages 10 through 13. Just</p> <p>20 take a second to read through.</p> <p>21 A From page 10 to 13?</p> <p>22 Q Yes, to the correct answer at the</p> <p>23 bottom of 13. You can go to the bottom of 13.</p> <p>24 Are you finished?</p> <p>25 A Yes.</p> <p style="text-align: right;">Page 153</p>

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<p>1 YVETTE WANG</p> <p>2 Q Okay. Now do you recall now that you</p> <p>3 testified that Mr. Guo introduced you to Eastern</p> <p>4 Profit?</p> <p>5 MS. CLINE: Objection to form.</p> <p>6 A Now I do.</p> <p>7 Q All right. I don't want to get you</p> <p>8 too far down the road with Han Chunguang, because</p> <p>9 I remember his testimony.</p> <p>10 So how is it then that you learned</p> <p>11 that Han Chunguang had anything to do with Eastern</p> <p>12 Profit?</p> <p>13 A What's the question?</p> <p>14 Q How did you learn that Han Chunguang</p> <p>15 had anything to do with Eastern Profit?</p> <p>16 A How did I learn?</p> <p>17 Q Mm-hmm.</p> <p>18 A That was I asked him there's a</p> <p>19 project in here, kind of like are you interested.</p> <p>20 And then he told me Eastern Profit probably could</p> <p>21 join this project.</p> <p>22 Q Han Chunguang said this to you?</p> <p>23 A I don't remember the precise words</p> <p>24 quote, okay. That is my impression. I was asking</p> <p>25 him, and then he agree with our big goal, to take</p> <p style="text-align: right;">Page 154</p>	<p>1 YVETTE WANG</p> <p>2 A Should I continue?</p> <p>3 Q Go ahead. I'm sorry. I thought you</p> <p>4 were done.</p> <p>5 A He told me Eastern Profit could be</p> <p>6 onboard. I can go ahead to sign a contract.</p> <p>7 Q Did he explain to you what his</p> <p>8 relationship with Eastern Profit was?</p> <p>9 A I forgot the precise words he told</p> <p>10 me, but he expressed he was or he is running</p> <p>11 Eastern Profits, and he told me Eastern Profits</p> <p>12 will be on the same side with our big anti-CCP,</p> <p>13 Chinese Communist Party.</p> <p>14 Q Did Mr. Han tell you what his duties</p> <p>15 and responsibilities were?</p> <p>16 A He was running. My impression is he</p> <p>17 was running.</p> <p>18 Q Who told you he was the, quote,</p> <p>19 principal of Eastern?</p> <p>20 MS. CLINE: Objection to form.</p> <p>21 A Called principal.</p> <p>22 Q Who told you that he was the</p> <p>23 principal of Eastern?</p> <p>24 MS. CLINE: Objection to form.</p> <p>25 A That is my understanding, he's the</p> <p style="text-align: right;">Page 156</p>
<p>1 YVETTE WANG</p> <p>2 down CCB. And he said kind of like it's a great</p> <p>3 job. Let's do it.</p> <p>4 Q Who told you that Han Chunguang had</p> <p>5 any authority to act on behalf of Eastern Profit?</p> <p>6 MS. CLINE: Objection to form.</p> <p>7 A You mean when?</p> <p>8 Q No. Who. Who told you that Han</p> <p>9 Chunguang had any authority to act on behalf of</p> <p>10 Eastern Profit?</p> <p>11 A Mei told me.</p> <p>12 Q When did she tell you that?</p> <p>13 A I forgot the precise time. It should</p> <p>14 be sometime in 2018.</p> <p>15 Q Okay. But back in December of 2017,</p> <p>16 all right --</p> <p>17 A Yes.</p> <p>18 Q -- when you testified that Han</p> <p>19 Chunguang gave you authority to sign the research</p> <p>20 agreement on behalf of Eastern Profit, who told</p> <p>21 you that Han Chunguang had any authority to speak</p> <p>22 on behalf of Eastern Profit?</p> <p>23 MS. CLINE: Objection to form.</p> <p>24 A He told me.</p> <p>25 Q He told you?</p> <p style="text-align: right;">Page 155</p>	<p>1 YVETTE WANG</p> <p>2 principal.</p> <p>3 Q And who told you that?</p> <p>4 A Mr. Han expressed Eastern could be</p> <p>5 onboard and he runs eastern. So I recognize him.</p> <p>6 He is a principal.</p> <p>7 And later on Mei confirmed her</p> <p>8 authorization to Mr. Han also which double confirm</p> <p>9 my recognition to Mr. Han as the principal of</p> <p>10 Eastern Profit.</p> <p>11 Q Do you remember testifying at your</p> <p>12 deposition in January that you didn't know what</p> <p>13 Mr. Han's duties and responsibilities were, and it</p> <p>14 was Mr. Guo who told you he was the principal of</p> <p>15 Eastern?</p> <p>16 MS. CLINE: Objection to form.</p> <p>17 A Which page?</p> <p>18 Q Page 97. You can start up on 96 if</p> <p>19 you want to. The person starts asking about</p> <p>20 Chunguang Han at line 13.</p> <p>21 All right Miss Wang, do you see that</p> <p>22 the questioner asked you at the bottom of 96, he</p> <p>23 says, line 18: What is his exact position</p> <p>24 Eastern?</p> <p>25 You answer: He is the President of</p> <p style="text-align: right;">Page 157</p>

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<p>1 YVETTE WANG</p> <p>2 before and after those couple of days. I don't</p> <p>3 have the precise dates.</p> <p>4 Q You first learned of Eastern Profit's</p> <p>5 existence just before going down to Virginia to</p> <p>6 sign the contract with Miss Wallop; isn't that</p> <p>7 right?</p> <p>8 MS. CLINE: Objection to form.</p> <p>9 A That's correct.</p> <p>10 (Wang Exhibit 4, a document</p> <p>11 titled Research Agreement dated</p> <p>12 January 1, 2018 and Bates stamped</p> <p>13 Eastern-000001 to Eastern-000004</p> <p>14 previously marked for Identification</p> <p>15 as of this date.)</p> <p>16 Q I'm going to hand you what we marked</p> <p>17 in the original deposition as Exhibit 4. I'm</p> <p>18 giving you another copy for your attorney.</p> <p>19 This is Wong Exhibit 4, Eastern Bates</p> <p>20 numbers 1 through 4. This is a document that you,</p> <p>21 or that Eastern produced to us in this case. And</p> <p>22 if you want, you can compare it. Maybe it will be</p> <p>23 helpful to compare it to the actual research</p> <p>24 agreement which is Exhibit -- Wang Exhibit 2.</p> <p>25 You'll see they're not the same</p> <p style="text-align: right;">Page 162</p>	<p>1 YVETTE WANG</p> <p>2 Q Do you recall this being -- first of</p> <p>3 all, the agreement wasn't signed on January 1; was</p> <p>4 it?</p> <p>5 A You're right.</p> <p>6 Q And do you recall this being a draft</p> <p>7 of the agreement, at least a draft, maybe not the</p> <p>8 only draft, as of January 1, 2018?</p> <p>9 MS. CLINE: Exhibit 41.</p> <p>10 MR. GREIM: Yes, Exhibit 4.</p> <p>11 A It has been almost 20 months. I</p> <p>12 don't remember clearly what was the negotiation,</p> <p>13 but since this is Eastern, we produce this. I</p> <p>14 have to say yes.</p> <p>15 Q And do you recall that at this time I</p> <p>16 won't -- I don't want to characterize this the</p> <p>17 wrong way, but do you agree that at this time</p> <p>18 Eastern Profit had not been identified yet as the</p> <p>19 entity that would be entering the contract?</p> <p>20 MS. CLINE: At which time?</p> <p>21 MR. GREIM: As of January 1,</p> <p>22 2018.</p> <p>23 A You are asking me by January 1, 2018,</p> <p>24 Eastern Profit was not recognized?</p> <p>25 Q Right.</p> <p style="text-align: right;">Page 164</p>
<p>1 YVETTE WANG</p> <p>2 document; are they?</p> <p>3 A You're right.</p> <p>4 Q Wang Exhibit 4 doesn't have</p> <p>5 signatures on it; right?</p> <p>6 A Correct.</p> <p>7 Q It doesn't have the same payment</p> <p>8 terms. The amount is only \$250,000. If you look</p> <p>9 on page 4 of Wang Exhibit 4, do you see that?</p> <p>10 A I'm reading this. You want me just</p> <p>11 to read this paragraph; right?</p> <p>12 Q Yeah. My only question is I just</p> <p>13 wanted you to look at the payment terms paragraph.</p> <p>14 And I'm just asking you to see that this is only</p> <p>15 \$250,000 a month in this draft; is that right?</p> <p>16 A Correct.</p> <p>17 Q And strategic was demanding a much</p> <p>18 higher amount, which it ultimately got, \$750,000 a</p> <p>19 month; isn't that right?</p> <p>20 MS. CLINE: Objection to form.</p> <p>21 A Correct.</p> <p>22 Q If you go to the front of Wong</p> <p>23 Exhibit 4, you see the date typed up in the top is</p> <p>24 January 1, 2018?</p> <p>25 A Yes.</p> <p style="text-align: right;">Page 163</p>	<p>1 YVETTE WANG</p> <p>2 A No. I don't agree with you.</p> <p>3 Q Okay. Okay.</p> <p>4 So when was Eastern Profit first</p> <p>5 identified as the contracting party for we'll call</p> <p>6 it your side of the contract?</p> <p>7 A Was identified? You mean confirmed</p> <p>8 or found; right?</p> <p>9 Q Sure.</p> <p>10 A I don't remember that clearly, but I</p> <p>11 started to talk to Hank kind of like November</p> <p>12 earliest, November, December of 2017.</p> <p>13 Q But you testified that you didn't</p> <p>14 learn the name of Eastern Profit until just before</p> <p>15 going down to Virginia to negotiate with French</p> <p>16 Wallop. So how could Eastern Profit have been</p> <p>17 identified back in November of 2017?</p> <p>18 MS. CLINE: Objection to form.</p> <p>19 Mischaracterizes testimony.</p> <p>20 A Why before? Like two hours right</p> <p>21 before I came down to Virginia? I'm talking about</p> <p>22 like a month or two month. Less than two month.</p> <p>23 I don't think that is a long time. I can still</p> <p>24 quote that as right before.</p> <p>25 Q Is it your testimony that you first</p> <p style="text-align: right;">Page 165</p>

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<p>1 YVETTE WANG</p> <p>2 learned that Eastern Profit would be the</p> <p>3 contracting party in November of 2017?</p> <p>4 A I don't remember that clearly, but</p> <p>5 it's for sure the latest is November -- no,</p> <p>6 December or even November, late November of 2017.</p> <p>7 Q Mr. Chunguang Han is not a director</p> <p>8 of Eastern Profit, is he?</p> <p>9 A You're asking about now?</p> <p>10 Q Right.</p> <p>11 A He is not.</p> <p>12 Q Between September, 2017 and March,</p> <p>13 2018 he was not a director of Eastern Profit, was</p> <p>14 he?</p> <p>15 A Between September of 2017 until when?</p> <p>16 Q March, 2018 he was not a director,</p> <p>17 was he?</p> <p>18 A He was not.</p> <p>19 Q Is there any document appointing</p> <p>20 Mr. Han as any sort of an officer or</p> <p>21 representative of Eastern Profit for the period</p> <p>22 September, 2017 to March, 2018?</p> <p>23 A He is authorized.</p> <p>24 Q My question is is there a document</p> <p>25 giving him that authority?</p> <p style="text-align: right;">Page 166</p>	<p>1 YVETTE WANG</p> <p>2 me also, but I don't remember that clearly.</p> <p>3 Q Okay. So other than a recollection</p> <p>4 that at some point Mr. Han and Miss Mei told you</p> <p>5 that he had authority to act for Eastern Profit</p> <p>6 between September, 2017 and March, 2018, can</p> <p>7 Eastern Profit point to any other documents</p> <p>8 reflecting that he had that role?</p> <p>9 A I didn't ask.</p> <p>10 Q Do they exist? Do the documents</p> <p>11 exist?</p> <p>12 A I did not ask.</p> <p>13 MR. GREIM: Why don't we take a</p> <p>14 short break. Let's take a</p> <p>15 five-minute break.</p> <p>16 THE VIDEOGRAPHER: The time is</p> <p>17 3:25 p.m., Wednesday, October 30,</p> <p>18 2019.</p> <p>19 This is the end of media number</p> <p>20 3 of the videotaped deposition of</p> <p>21 Yvette Wang.</p> <p>22 We're off the record.</p> <p>23 (At this time, a brief recess</p> <p>24 was taken.)</p> <p>25 THE VIDEOGRAPHER: The time is</p> <p style="text-align: right;">Page 168</p>
<p>1 YVETTE WANG</p> <p>2 A I didn't remember I saw that document</p> <p>3 paper, no.</p> <p>4 Q Why do you believe he is authorized?</p> <p>5 Let's stick to the period of September of 2017 to</p> <p>6 March, 2018.</p> <p>7 Why does Eastern Profit say he's</p> <p>8 authorized to act during that period?</p> <p>9 A September, 2017 until March, 2018;</p> <p>10 right?</p> <p>11 I don't remember the precise words.</p> <p>12 My impression is I was told he was the director.</p> <p>13 He is still running the company authorized by the</p> <p>14 director.</p> <p>15 And then later on Mei confirmed</p> <p>16 Mr. Han made the correct representation about</p> <p>17 himself and his wife.</p> <p>18 Q Okay. So who is the person that told</p> <p>19 you that he had been given authority to act on</p> <p>20 behalf of Eastern Profit between September, 2017</p> <p>21 and March, 2018?</p> <p>22 MS. CLINE: Objection to form.</p> <p>23 Asked and answered.</p> <p>24 A Mr. Han, he expressed it to me. I</p> <p>25 don't remember clearly. Miss Mei mentioned it to</p> <p style="text-align: right;">Page 167</p>	<p>1 YVETTE WANG</p> <p>2 3:39 p.m., Wednesday, October 30,</p> <p>3 2019. This is media number 4 of the</p> <p>4 videotaped deposition of Miss Yvette</p> <p>5 Wang. We're back on the record.</p> <p>6 CONTINUED EXAMINATION</p> <p>7 BY MR. GREIM:</p> <p>8 Q All right, Miss Wang. Welcome back.</p> <p>9 Based on your most recent testimony,</p> <p>10 it sounds like there are two individuals who we</p> <p>11 can say had knowledge of the negotiation of the</p> <p>12 contract between Eastern Profit and Strategic</p> <p>13 Division, Guo Mei and Han Chunguang. Is that</p> <p>14 correct?</p> <p>15 MS. CLINE: Objection.</p> <p>16 Q Let me strike that.</p> <p>17 A Too long a question. I going to</p> <p>18 forget.</p> <p>19 Q Is it fair to say that Han Chunguang</p> <p>20 and Guo Mei had knowledge of Eastern Profit's</p> <p>21 negotiation of the contract with Eastern -- with</p> <p>22 Strategic Vision?</p> <p>23 A You're talking about this research</p> <p>24 agreement; right?</p> <p>25 Q I am.</p> <p style="text-align: right;">Page 169</p>

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<p>1 YVETTE WANG</p> <p>2 A They don't have the details like in</p> <p>3 terms of this contract. But they know or they</p> <p>4 knew we hired a so-called professional</p> <p>5 investigation company which really Shell Company</p> <p>6 and liars.</p> <p>7 Q But if I understand you correctly,</p> <p>8 you have now testified that Han Chunguang knew of</p> <p>9 the agreement before it was signed, approved of</p> <p>10 its purpose, and authorized you to sign it?</p> <p>11 MS. CLINE: Objection to form.</p> <p>12 Q Is that correct?</p> <p>13 A Mr. Han did not get that deeply</p> <p>14 involved.</p> <p>15 Q However, it is true, isn't it, that</p> <p>16 you told Han Chunguang about the contract, you</p> <p>17 told him about the goals of the contract, and you</p> <p>18 asked for his authority to sign it.</p> <p>19 That is your testimony today; isn't</p> <p>20 it?</p> <p>21 MS. CLINE: Objection to form.</p> <p>22 A I told him we found a research</p> <p>23 company. Miles was meeting with their</p> <p>24 representatives. They seem like qualified and</p> <p>25 professional by them. Most likely we can contract</p> <p style="text-align: right;">Page 170</p>	<p>1 YVETTE WANG</p> <p>2 Q Very good. Please take a look at</p> <p>3 what we marked in your other deposition as Wang</p> <p>4 Exhibit 3.</p> <p>5 (Wang Exhibit 3, a document</p> <p>6 titled Plaintiff Eastern Profit</p> <p>7 Corporation Limited's Responses and</p> <p>8 Objections to Defendant Strategic</p> <p>9 Vision US, LLC's First Set of</p> <p>10 Interrogatories previously marked for</p> <p>11 Identification as of this date.)</p> <p>12 Q Do you recognize these as Eastern</p> <p>13 Profit Limited's responses and objections to</p> <p>14 Strategic Vision's first set of interrogatories?</p> <p>15 You'll see that the second to last</p> <p>16 page you have signed it, and Karen Maistrello</p> <p>17 notarized your signature on December 20, 2018.</p> <p>18 A You want me to read through all the</p> <p>19 pages?</p> <p>20 Q No. I'm just asking do you remember</p> <p>21 verifying the interrogatory responses on behalf of</p> <p>22 Eastern Profit in this case. That's you, isn't</p> <p>23 it? You signed this?</p> <p>24 A Correct.</p> <p>25 Q Then if you go to page 1 -- I'm</p> <p style="text-align: right;">Page 172</p>
<p>1 YVETTE WANG</p> <p>2 them, start research.</p> <p>3 Q And before January 6, he told you</p> <p>4 that you can sign the agreement; is that right?</p> <p>5 A After I told him that, he said please</p> <p>6 go ahead. You are the miles. We believe you</p> <p>7 guys. Go ahead with this company.</p> <p>8 Q And your testimony also is that the</p> <p>9 reason you believed you had authority or -- I'm</p> <p>10 sorry. Let me strike that.</p> <p>11 The reason you believe that Han had</p> <p>12 authority to give you that approval, is that Han</p> <p>13 told you he had the authority and Guo Mei may told</p> <p>14 you he had the authority before you signed the</p> <p>15 contract; is that right?</p> <p>16 MS. CLINE: Objection to form.</p> <p>17 A Before I sign a contract I was</p> <p>18 authorized to proceed and execute with this</p> <p>19 contract. I was told I'm authorized to sign it.</p> <p>20 Q My question though is who told you</p> <p>21 that Han Chunguang could give you the authority</p> <p>22 to sign the contract? Who told you Han Chunguang</p> <p>23 had the authority on behalf of Eastern Profit?</p> <p>24 MS. CLINE: Objection to form.</p> <p>25 A Both Mr. Han and Miss Mei.</p> <p style="text-align: right;">Page 171</p>	<p>1 YVETTE WANG</p> <p>2 sorry, page 2, question 1, you see the very first</p> <p>3 thing says: Identify all persons with whom</p> <p>4 Eastern consulted when answering these</p> <p>5 interrogatories or who were otherwise involved in</p> <p>6 any way in answering these interrogatories?</p> <p>7 Do you see that question? Then in</p> <p>8 response, first Eastern objects, and then the</p> <p>9 second sentence you see where it says subject to</p> <p>10 Eastern's objection, Yvette Wong and Guo Wengui</p> <p>11 were consulted with answering these</p> <p>12 interrogatories.</p> <p>13 Did I read that right?</p> <p>14 A Yes.</p> <p>15 Q In fact you did consult with Guo</p> <p>16 Wengui when answering these interrogatories;</p> <p>17 didn't you?</p> <p>18 MS. CLINE: Objection to form.</p> <p>19 A I don't remember. This is the</p> <p>20 conversation my lawyer worked with.</p> <p>21 Q Then let's turn to -- well, let me</p> <p>22 ask you: Did you provide any input into these</p> <p>23 interrogatory responses?</p> <p>24 MS. CLINE: That's a yes or no</p> <p>25 question.</p> <p style="text-align: right;">Page 173</p>

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<p>1 YVETTE WANG</p> <p>2 A I reply you before, I believe, but I</p> <p>3 can repeat again. I put together name list. I</p> <p>4 took advice from Mr. Guo. I put together name</p> <p>5 list based on Internet whistle blow information.</p> <p>6 And I'm aware, like some of the bad guy, they go</p> <p>7 after Mr. Han and Miss Mei family in China.</p> <p>8 So if you won't say anyone put</p> <p>9 together that is my name list, I can tell you</p> <p>10 maximal there's people.</p> <p>11 Q Now originally there were to be 10</p> <p>12 names, and 5 were added; is that correct?</p> <p>13 A You're asking about negotiation of</p> <p>14 the contract terms?</p> <p>15 Q Yes, I am.</p> <p>16 A Kind of like, yes.</p> <p>17 Q What was the reason that five</p> <p>18 additional names were added? Let me ask you this.</p> <p>19 Did those five additional names have</p> <p>20 anything in common?</p> <p>21 A What do you mean in common?</p> <p>22 Q Well, for example did the same person</p> <p>23 recommend all five of the additional names?</p> <p>24 A The only thing --</p> <p>25 MS. CLINE: Objection to form.</p> <p style="text-align: right;">Page 194</p>	<p>1 YVETTE WANG</p> <p>2 than just to the best of your knowledge. I'm</p> <p>3 asking Eastern Profit.</p> <p>4 Did it engage anyone to research --</p> <p>5 anyone else other than Strategic Vision to</p> <p>6 research any of these 15 names?</p> <p>7 A Nope.</p> <p>8 Q What was the -- let me strike that.</p> <p>9 What was Eastern's plan for</p> <p>10 publicizing and using the information that</p> <p>11 Strategic Vision was supposed to obtain?</p> <p>12 A Of course to send this criminal</p> <p>13 person or criminal Chinese Communist Party</p> <p>14 officials into jail and to -- including Eastern</p> <p>15 Profit, the company, they're assets back.</p> <p>16 Q So Eastern Profit believed that the</p> <p>17 public outcry resulting from publicity would cause</p> <p>18 its assets to be unfrozen in Hong Kong?</p> <p>19 MS. CLINE: Objection to form.</p> <p>20 A There are some words I don't</p> <p>21 understand in your sentence. Archive, what is</p> <p>22 that? What's your question?</p> <p>23 Q So Eastern Profit believed that the</p> <p>24 public outcry --</p> <p>25 A Wait a second. Public outcry, what's</p> <p style="text-align: right;">Page 196</p>
<p>1 YVETTE WANG</p> <p>2 Sorry. Go ahead.</p> <p>3 A The only thing in common is five</p> <p>4 names, and 10 name, 15 name, they're all corrupted</p> <p>5 Chinese Communist Party official, or their family,</p> <p>6 or their like kids. I don't know that words.</p> <p>7 Private case. And that is the only thing they're</p> <p>8 in common.</p> <p>9 Q Other than with ACA, is there any</p> <p>10 other -- and I guess Mr. Guo, was there any other</p> <p>11 person with whom Eastern Profit intended to share</p> <p>12 the research results?</p> <p>13 A What's the question?</p> <p>14 Q Other than ACA and Mr. Guo, was there</p> <p>15 any other person with whom Eastern Profit intended</p> <p>16 to share the research results?</p> <p>17 MS. CLINE: Objection to form.</p> <p>18 A Eastern, of course, is happy to share</p> <p>19 the results. It was all Chinese people who are</p> <p>20 pursuing the rule of law and democracy of China.</p> <p>21 Q Did Eastern Profit engage anyone to</p> <p>22 research any of these 15 names, anyone other than</p> <p>23 Strategic Vision to research the 15 names?</p> <p>24 A To best of my knowledge, no.</p> <p>25 Q Okay. Now I want to ask you more</p> <p style="text-align: right;">Page 195</p>	<p>1 YVETTE WANG</p> <p>2 this?</p> <p>3 Q You never heard outcry? Let me</p> <p>4 choose a different word?</p> <p>5 A Sorry. Foreigner here.</p> <p>6 MS. CLINE: No need for</p> <p>7 commentary.</p> <p>8 MR. GREIM: No one says she's a</p> <p>9 foreigner here. I don't understand</p> <p>10 the reason for the comment.</p> <p>11 MS. CLINE: She's not a native</p> <p>12 English speaking person.</p> <p>13 MR. GREIM: I'm trying to ask a</p> <p>14 question, please.</p> <p>15 Q So Eastern Profits?</p> <p>16 MR. GREIM: Please stop</p> <p>17 interrupting. Finally.</p> <p>18 Q So Eastern Profit's plan was that the</p> <p>19 public reaction to it's publicizing this</p> <p>20 information would cause it's assets to be unfrozen</p> <p>21 in Hong Kong?</p> <p>22 MS. CLINE: Objection to form.</p> <p>23 A Eastern Profits believes to</p> <p>24 disclosure this corrupted Chinese official, bring</p> <p>25 the justice to Chinese people, and itself also.</p> <p style="text-align: right;">Page 197</p>

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<p>1 YVETTE WANG</p> <p>2 We'll be able to help all the Chinese</p> <p>3 people and itself, including I'm frozen, Eastern</p> <p>4 itself assets and back to normal business, which</p> <p>5 Eastern was conducting before their bank accounts</p> <p>6 was frozen.</p> <p>7 Q So I just want to understand this.</p> <p>8 This is the first time we're hearing about Eastern</p> <p>9 Profit wanting to unfreeze its assets.</p> <p>10 Did Eastern Profit believe that it</p> <p>11 would put its own prosecutors in jail in Hong</p> <p>12 Kong? Let me ask you this.</p> <p>13 What was Eastern Profit's specific</p> <p>14 plan to use the research in Hong Kong?</p> <p>15 MS. CLINE: Objection. It's</p> <p>16 Beyond the scope of your topics.</p> <p>17 Q Well, the very first topic is why did</p> <p>18 Eastern Profit enter into the contract. Question</p> <p>19 number 1. That's what we're trying to find out.</p> <p>20 We just learned it's to unfreeze its</p> <p>21 assets. So I would like to know about the</p> <p>22 specifics of this.</p> <p>23 How specifically did Eastern Profit</p> <p>24 believe it was going to be able to use the</p> <p>25 research results to unfreeze it's Hong Kong</p> <p style="text-align: right;">Page 198</p>	<p>1 YVETTE WANG</p> <p>2 appearing on the list is why did EP</p> <p>3 enter into the contract. The second</p> <p>4 sentence is: What circumstances led</p> <p>5 EP to seek research.</p> <p>6 MR. PODHASKIE: Join. I'm --</p> <p>7 MR. GREIM: Please do not enter</p> <p>8 into the record.</p> <p>9 MS. CLINE: Which is the letter</p> <p>10 you're referring to?</p> <p>11 MR. GREIM: I'll just give you</p> <p>12 a copy. This is my E-mail to you of</p> <p>13 October 3rd, 2019. I attached a word</p> <p>14 document. You can pass it over to</p> <p>15 your attorney.</p> <p>16 Let's go off the record.</p> <p>17 MS. CLINE: No. Let's keep</p> <p>18 going.</p> <p>19 MR. GREIM: We're using up time</p> <p>20 now. I think it's a spurious</p> <p>21 objection.</p> <p>22 THE VIDEOGRAPHER: Off the</p> <p>23 record.</p> <p>24 MS. CLINE: On the record.</p> <p>25 Q So the question is: What was Eastern</p> <p style="text-align: right;">Page 200</p>
<p>1 YVETTE WANG</p> <p>2 assets?</p> <p>3 MS. CLINE: What was the</p> <p>4 number 1 that you were just referring</p> <p>5 to?</p> <p>6 MR. GREIM: I'm referring you to</p> <p>7 the long list, item 1, very first</p> <p>8 question sent to you on August 13.</p> <p>9 MS. CLINE: You're not referring</p> <p>10 to the deposition notice; right?</p> <p>11 MR. GREIM: No. Within the</p> <p>12 deposition notice it's under research</p> <p>13 agreement including negotiations</p> <p>14 concerning the same.</p> <p>15 Question 1: Why did EP enter</p> <p>16 into the contract?</p> <p>17 MS. CLINE: I mean the notice</p> <p>18 topic is the research agreement and</p> <p>19 negotiations. I will give you a</p> <p>20 little leeway.</p> <p>21 MR. GREIM: We're in between</p> <p>22 counsel, which is supposed to be</p> <p>23 honored by the court's order, which I</p> <p>24 sent to you October 3rd is this list.</p> <p>25 And the very first question</p> <p style="text-align: right;">Page 199</p>	<p>1 YVETTE WANG</p> <p>2 Profit's specific plan to use the research to free</p> <p>3 up its Hong Kong assets?</p> <p>4 MS. CLINE: You're representing</p> <p>5 that that question isn't on here?</p> <p>6 MR. GREIM: No. It's the first</p> <p>7 two questions.</p> <p>8 Q Why did Eastern Profit enter into the</p> <p>9 contract? You just learned for the first time</p> <p>10 that it's to free up some frozen Hong Kong.</p> <p>11 I'm trying to learn about the</p> <p>12 specific plan that Eastern Profit had.</p> <p>13 MS. CLINE: You're</p> <p>14 mischaracterizing her testimony. If</p> <p>15 you want to know why did Eastern</p> <p>16 Profit enter into the contract, you</p> <p>17 can ask her that question again.</p> <p>18 You're twisting --</p> <p>19 MR. GREIM: I'm not limited to</p> <p>20 using the exact words on that</p> <p>21 document. I'm following up on the</p> <p>22 witness' questioning, and I'm being</p> <p>23 obstructed.</p> <p>24 I would like to get an answer to</p> <p>25 the question.</p> <p style="text-align: right;">Page 201</p>

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<p>1 YVETTE WANG</p> <p>2 Q What was Eastern Profit's specific</p> <p>3 plan to use the research results to unfreeze its</p> <p>4 Hong Kong assets?</p> <p>5 MS. CLINE: Objection to form.</p> <p>6 Mischaracterizes testimony and beyond</p> <p>7 the scope of counsel's agreement</p> <p>8 regarding the scope of the</p> <p>9 deposition.</p> <p>10 You can answer.</p> <p>11 A I'm happy to tell you. I remember on</p> <p>12 my name list there are two person. One is called</p> <p>13 M-E-N-G, J-I-A-N, Z-H-U. He was the hat or steel</p> <p>14 head of entire China, police, court, persecutor.</p> <p>15 Almost -- most of the law enforcement. He's the</p> <p>16 head of that. The most powerful person. One of</p> <p>17 the most powerful person in China.</p> <p>18 Q And so you hoped --</p> <p>19 A Let me finish.</p> <p>20 Q You paused for so long, I thought you</p> <p>21 were done.</p> <p>22 A I'm trying to help you.</p> <p>23 Q I'm sorry. Keep going.</p> <p>24 A I told you I have language barrier.</p> <p>25 You have to allow me finish.</p> <p style="text-align: right;">Page 202</p>	<p>1 YVETTE WANG</p> <p>2 sorry, PRC official?</p> <p>3 A He is Chinese Communist Party</p> <p>4 official, yes.</p> <p>5 Q So that's one person. You said there</p> <p>6 was a second person. Who was that?</p> <p>7 A The second person is Sun Li Jum.</p> <p>8 S-U-N, L-I, J-U-M.</p> <p>9 Q Okay. Go ahead.</p> <p>10 A I finished.</p> <p>11 Q I'm sorry. That time you were done.</p> <p>12 Okay.</p> <p>13 What was the plan with respect to</p> <p>14 him? How was that going to unfreeze the assets?</p> <p>15 A A similar plan.</p> <p>16 Q Anyone else in your list of 15 names</p> <p>17 that were going to help unfreeze the Eastern</p> <p>18 Profit assets in Hong Kong?</p> <p>19 MS. CLINE: Objection to form.</p> <p>20 A Everyone.</p> <p>21 Q Okay. How were ACA assets able to</p> <p>22 flow out of Hong Kong?</p> <p>23 MS. CLINE: Objection. Beyond</p> <p>24 the scope.</p> <p>25 MR. GREIM: Let's take a short</p> <p style="text-align: right;">Page 204</p>
<p>1 YVETTE WANG</p> <p>2 Q I thought you were finished with the</p> <p>3 sentence when a few second ticked by. Go on</p> <p>4 ahead.</p> <p>5 A So clearly of Eastern's previous</p> <p>6 directors, current directors, they were all</p> <p>7 persecuted by this corrupted Chinese official.</p> <p>8 So Eastern would like to disclosure</p> <p>9 this corrupted Chinese official. His legal</p> <p>10 assets, his crimes, et cetera to bring the justice</p> <p>11 to China.</p> <p>12 And it should be a natural</p> <p>13 understanding to Eastern and all the Chinese</p> <p>14 people who are persecuted by this bad official.</p> <p>15 If this official is completely</p> <p>16 removed, sent to jail, and they will be able to</p> <p>17 get their justice back including -- you know the</p> <p>18 relationship between Hong Kong and Beijing; right?</p> <p>19 You don't need me to explain that. That will</p> <p>20 naturally bring justice to Hong Kong for Eastern</p> <p>21 Profit to release his assets which were illegally</p> <p>22 frozen.</p> <p>23 Q In Hong Kong?</p> <p>24 A Correct.</p> <p>25 Q And this Mr. Meng is a CCP or, I'm</p> <p style="text-align: right;">Page 203</p>	<p>1 YVETTE WANG</p> <p>2 break.</p> <p>3 THE VIDEOGRAPHER: The time is</p> <p>4 4:39 p.m., Wednesday, October 30,</p> <p>5 2019. This is the end of Media 4 in</p> <p>6 the deposition of Yvette Wang.</p> <p>7 We're off the record.</p> <p>8 (At this time, a brief recess</p> <p>9 was taken.)</p> <p>10 THE VIDEOGRAPHER: The time is</p> <p>11 4:56 p.m., Wednesday, October 30,</p> <p>12 2019.</p> <p>13 This is media number 5 of the</p> <p>14 videotaped deposition of Missy Wong.</p> <p>15 We're back on the record.</p> <p>16 EXAMINATION CONTINUED</p> <p>17 BY MR. GREIM:</p> <p>18 Q Miss Wong, we're going to jump around</p> <p>19 a little bit between some different topics and try</p> <p>20 to wrap up today.</p> <p>21 My first question is earlier we</p> <p>22 talked about the Power of Attorney by which</p> <p>23 Eastern Profit granted to Gold Spring, New York.</p> <p>24 My question for you is who on behalf</p> <p>25 of Eastern Profit authorized Han Chunguang to</p> <p style="text-align: right;">Page 205</p>

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<p>1 YVETTE WANG</p> <p>2 sign that Power of Attorney?</p> <p>3 MS. CLINE: Objection. I'm not</p> <p>4 sure that's within the scope.</p> <p>5 If you know the answer, you can</p> <p>6 answer.</p> <p>7 A I have, I believe, Miss Mei. M-E-I.</p> <p>8 Q Were any lenders, other than ACA,</p> <p>9 approached by Eastern Profit for purposes of this</p> <p>10 contract?</p> <p>11 MS. CLINE: Again, objection.</p> <p>12 Beyond the scope.</p> <p>13 A I didn't hear about that.</p> <p>14 Q In other words, did ACA try to find a</p> <p>15 competitive -- find competitive loan terms?</p> <p>16 A Find competitive loan terms?</p> <p>17 Q Right. In other words, did it see if</p> <p>18 it could find cheaper financing from somebody</p> <p>19 other than ACA?</p> <p>20 A You're asking do I know or not?</p> <p>21 Q My question is did Eastern Profit try</p> <p>22 to shop for the best loan terms it could?</p> <p>23 A I didn't hear about this.</p> <p>24 Q Does Eastern Profit have any plan to</p> <p>25 repay the loan other than getting its assets</p> <p style="text-align: right;">Page 206</p>	<p>1 YVETTE WANG</p> <p>2 So besides Eastern is looking for</p> <p>3 release their bank accounts from Hong Kong to pay</p> <p>4 back the loan, is there any other way Eastern</p> <p>5 planned to pay back?</p> <p>6 Q Correct.</p> <p>7 A Okay. I didn't discuss that yet, but</p> <p>8 I heard kind of like William would be happy to</p> <p>9 contribute this fund into the entire taking down</p> <p>10 Chinese Communist Party campaign. But I don't</p> <p>11 have too much details.</p> <p>12 Q So had the research been successful,</p> <p>13 Mr. Yu would have been happy to write off the</p> <p>14 loan?</p> <p>15 MS. CLINE: Objection to form.</p> <p>16 A Possible.</p> <p>17 Q Did Eastern Profit intend to keep</p> <p>18 borrowing from ACA for the rest of the contract?</p> <p>19 MS. CLINE: Objection to the</p> <p>20 form.</p> <p>21 A I think I replied to your question.</p> <p>22 Still the same answer. Possible.</p> <p>23 Q Did Eastern Profit hire T and M</p> <p>24 Security to research these names, any of these 15</p> <p>25 names?</p> <p style="text-align: right;">Page 208</p>
<p>1 YVETTE WANG</p> <p>2 unfrozen in Hong Kong?</p> <p>3 MS. CLINE: Objection to form.</p> <p>4 A What do you mean other than assets?</p> <p>5 Q Let me go back.</p> <p>6 So let's suppose that Strategic</p> <p>7 Vision -- I asked a question, not the same</p> <p>8 question, but a similar one earlier.</p> <p>9 Let's suppose Strategic Vision had</p> <p>10 given Eastern Profit all of the research it wanted</p> <p>11 for an entire year, for the entire term of the</p> <p>12 contract. Let's say that it happened.</p> <p>13 Did Eastern Profit have any plan to</p> <p>14 repay ACA's loan other than by effecting political</p> <p>15 change in China?</p> <p>16 MS. CLINE: Objection to form.</p> <p>17 Hypothetical.</p> <p>18 You can answer, if you can.</p> <p>19 A It's hard to understand your</p> <p>20 question. Still I don't quite understand your</p> <p>21 question. You mean F, Strategic Vision, they</p> <p>22 are -- which they are not, they are qualified to</p> <p>23 deliver the reports which agreed in the contract,</p> <p>24 which means the contract happened. I mean with</p> <p>25 merits or with facts happened.</p> <p style="text-align: right;">Page 207</p>	<p>1 YVETTE WANG</p> <p>2 A No.</p> <p>3 Q Did it hire Robert Tucker or Dunkin</p> <p>4 Levitt to research any of these 15 names?</p> <p>5 A No.</p> <p>6 Q Did Eastern Profit expend any money</p> <p>7 in coming up with its list of 15 names?</p> <p>8 A I don't understand the question.</p> <p>9 Sorry.</p> <p>10 Q Did Eastern Profit -- so you've</p> <p>11 testified that you and Mr. Guo came up with a list</p> <p>12 of 15 names, and that you considered various</p> <p>13 factors.</p> <p>14 My question to you is did Eastern</p> <p>15 Profit spend any money in developing its list of</p> <p>16 15 names?</p> <p>17 MS. CLINE: Objection to form.</p> <p>18 A Spend any money in developing my name</p> <p>19 at least; right?</p> <p>20 Q Correct.</p> <p>21 A If you are talking about Eastern's</p> <p>22 assets were frozen, they could not continue their</p> <p>23 normal business. The damage should be count as</p> <p>24 cost to spend.</p> <p>25 Q I'm sorry. My question was did</p> <p style="text-align: right;">Page 209</p>

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<p>1 YVETTE WANG</p> <p>2 Eastern Profit spend money in developing the list</p> <p>3 of 15 names?</p> <p>4 MS. CLINE: Objection to form.</p> <p>5 A I don't know, but I will say no.</p> <p>6 Q Did Eastern Profit spend any money to</p> <p>7 develop the supporting materials it provided to</p> <p>8 Strategic Vision along with the 15 names?</p> <p>9 MS. CLINE: Objection to form.</p> <p>10 A The 15 names, they are public,</p> <p>11 international. No, international information.</p> <p>12 Why Eastern Profits should spend money to the</p> <p>13 American names, should spend money to build the</p> <p>14 list.</p> <p>15 Q That's my question to you. Did it?</p> <p>16 A I believe I reply to your question</p> <p>17 with my question.</p> <p>18 Q But I would like an answer.</p> <p>19 MS. CLINE: Asked and answered.</p> <p>20 A No. It's public Internet</p> <p>21 information. Let me repeat again. Everyone has</p> <p>22 access.</p> <p>23 Q Was Eastern Profit aware that Guo had</p> <p>24 hired researchers to investigate the same 15 names</p> <p>25 that Strategic Vision was researching?</p> <p style="text-align: right;">Page 210</p>	<p>1 YVETTE WANG</p> <p>2 Wallop to have Strategic Vision send the money</p> <p>3 back to ACA?</p> <p>4 A Yes. I asked Wallop.</p> <p>5 Q Why did you ask her to send the money</p> <p>6 back to ACA instead of to Eastern Profit?</p> <p>7 MS. CLINE: Objection. To the</p> <p>8 extent all this stuff was asked in</p> <p>9 the first deposition, and now we're</p> <p>10 reinventing wheels again.</p> <p>11 You can answer.</p> <p>12 A Eastern Profits bank account is</p> <p>13 frozen. How can Eastern be able to receive</p> <p>14 refund, return, let's say. Sorry about my</p> <p>15 language. Return of money.</p> <p>16 Q What is the latest conversation</p> <p>17 you've had with ACA or William Je about the</p> <p>18 million dollars?</p> <p>19 MS. CLINE: Objection. Asked</p> <p>20 and answered.</p> <p>21 A Latest conversation, you mean the</p> <p>22 last conversation today?</p> <p>23 Q The most recent, yes.</p> <p>24 A Last month.</p> <p>25 Q Okay.</p> <p style="text-align: right;">Page 212</p>
<p>1 YVETTE WANG</p> <p>2 MS. CLINE: Objection to form.</p> <p>3 Assumes facts not in evidence.</p> <p>4 A No.</p> <p>5 Q By the way, some of the accompanying</p> <p>6 information in the 15 names that Eastern Profit</p> <p>7 gave to Strategic Vision included birthdays,</p> <p>8 passport numbers, Social Security numbers.</p> <p>9 Is it your testimony that all that</p> <p>10 information was already on the Internet?</p> <p>11 A Correct. You can try.</p> <p>12 Q You recall an attempt to retract the</p> <p>13 two \$500,000 wires that ACA sent to Strategic</p> <p>14 Vision?</p> <p>15 A How much money?</p> <p>16 Q Two \$500,000 wires for a total of</p> <p>17 \$1 million.</p> <p>18 Do you recall an attempt to retract</p> <p>19 those wires?</p> <p>20 A \$250,000.</p> <p>21 Q No. Two \$500,000 wires.</p> <p>22 A Oh. Two half million; right?</p> <p>23 Q Correct?</p> <p>24 A Yes, I remember it.</p> <p>25 Q And do you recall asking French</p> <p style="text-align: right;">Page 211</p>	<p>1 YVETTE WANG</p> <p>2 A Or yeah, like a month ago or a month</p> <p>3 and a half, yeah.</p> <p>4 Q Have you spoken with anyone other</p> <p>5 than William Je at ACA about the loan?</p> <p>6 A Nope.</p> <p>7 Q A few of the people we've been</p> <p>8 talking about today here, for one, William Je,</p> <p>9 where does he reside?</p> <p>10 MS. CLINE: Objection. Again,</p> <p>11 this is a 30(b)(6) of the Eastern</p> <p>12 Profit designee. We specifically had</p> <p>13 an agreement that we would not go</p> <p>14 into ACA, it's corporate structure or</p> <p>15 anything like that, and you know it.</p> <p>16 This is way outside the scope of our</p> <p>17 agreement.</p> <p>18 MR. GREIM: It sounds like he is</p> <p>19 a witness. And if you want to</p> <p>20 instruct the witness not to answer</p> <p>21 because it's outside the scope of the</p> <p>22 agreement, so be it. I can't make --</p> <p>23 MS. CLINE: He's outside the</p> <p>24 scope.</p> <p>25 Q What about Guo Mei, is she in the</p> <p style="text-align: right;">Page 213</p>

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<p>1 YVETTE WANG</p> <p>2 A Are you talking about first</p> <p>3 deposition?</p> <p>4 Q Yes. Do you recall that you were a</p> <p>5 30(b)(6) witness before?</p> <p>6 A I should be.</p> <p>7 Q Did you confer with Mr. Je, I say it</p> <p>8 different every time, about the research agreement</p> <p>9 in this case in December of 2017?</p> <p>10 A December of 2017 Mr. Je?</p> <p>11 Q Correct.</p> <p>12 A Who is Mr. Je?</p> <p>13 Q Well, Mr. Yu.</p> <p>14 A You're talking about William.</p> <p>15 Q I am. William. I should just call</p> <p>16 him William probably.</p> <p>17 A Much easier. Talk to him about what?</p> <p>18 Q About the research agreement?</p> <p>19 A I didn't remember that.</p> <p>20 Q How about in January, 2018?</p> <p>21 MS. CLINE: Again, our agreement</p> <p>22 regarding the scope of questioning</p> <p>23 about ACA was limited to the</p> <p>24 negotiations of the loan.</p> <p>25 Q My question is is one of the people</p> <p style="text-align: right;">Page 222</p>	<p>1 YVETTE WANG</p> <p>2 A Ask William by when, January 2018?</p> <p>3 Q Sure. December, 2017 or January,</p> <p>4 2018.</p> <p>5 A I don't remember.</p> <p>6 Q Does Eastern Profit report on the</p> <p>7 progress of this case to William Yu?</p> <p>8 MS. CLINE: Objection. Form.</p> <p>9 A Does Eastern Profit? If you are</p> <p>10 talking about the previous director and the</p> <p>11 current director, no, because these two people</p> <p>12 fully authorized everything to me. They don't</p> <p>13 know the details. They're not involved. If you</p> <p>14 are talking about me, mention what to William?</p> <p>15 Q The progress of this case.</p> <p>16 A Yeah, I mentioned the progress of</p> <p>17 this case to him. Yeah.</p> <p>18 MR. GREIM: Can I ask -- I think</p> <p>19 I'm done here.</p> <p>20 Can I ask that the witness</p> <p>21 produce her copy of the 15 names to</p> <p>22 counsel and that they just be</p> <p>23 produced to us?</p> <p>24 MS. CLINE: We will take that</p> <p>25 under advisement?</p> <p style="text-align: right;">Page 224</p>
<p>1 YVETTE WANG</p> <p>2 that you were conferring with for direction as you</p> <p>3 were negotiating the contract with Strategic</p> <p>4 Vision William Yu?</p> <p>5 A Conferring what? I --</p> <p>6 Q Talking to.</p> <p>7 A Okay. Talking to William about.</p> <p>8 Q Correct, the research.</p> <p>9 A The research agreement.</p> <p>10 Q Right.</p> <p>11 A When? By January --</p> <p>12 Q January, 2018.</p> <p>13 A 2018.</p> <p>14 Q Yes.</p> <p>15 A I don't remember.</p> <p>16 Q Did you ask for his advice in any of</p> <p>17 the 15 names?</p> <p>18 A Ask William; right?</p> <p>19 Q Correct.</p> <p>20 A No.</p> <p>21 Q Did you check with him to determine</p> <p>22 whether getting information on these names would</p> <p>23 help to unfreeze Eastern Profit's assets in Hong</p> <p>24 Kong?</p> <p>25 MS. CLINE: Objection.</p> <p style="text-align: right;">Page 223</p>	<p>1 MR. GREIM: Okay.</p> <p>2 I know what you've said here</p> <p>3 today, but I believe that was what we</p> <p>4 had. I'll just make the request and</p> <p>5 you can take it under advisement.</p> <p>6 I don't have any other questions</p> <p>7 for the witness.</p> <p>8 We're off the record. The</p> <p>9 deposition is concluded.</p> <p>10 THE VIDEOGRAPHER: The time is</p> <p>11 5:28 p.m. Wednesday, October 30,</p> <p>12 2019. This is the end of media</p> <p>13 number 5 and completes the videotaped</p> <p>14 deposition of Miss Yvette Wang.</p> <p>15 We're off the record.</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p style="text-align: right;">Page 225</p>

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October 30, 2019

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<div><div>2</div><div>3</div><div>4</div><div>5</div><div>6</div><div>7</div><div>8</div><div>9</div><div>10</div><div>11</div><div>12</div><div>13</div><div>14</div><div>15</div><div>16</div><div>17</div><div>18</div><div>19</div><div>20</div><div>21</div><div>22</div><div>23</div><div>24</div><div>25</div></div> <div><p style="text-align: center;">C E R T I F I C A T E</p><p>I, Terri Fudens, a stenotype reporter and Notary Public within and for the State of New York, do hereby certify:</p><p>That the witness whose testimony is hereinbefore set forth was duly sworn by me and that such testimony is a true record of the testimony given by such witness.</p><p>I further certify that I am not related to any of the parties by blood or marriage, and that I am in no way interested in the outcome of this matter.</p><p>IN WITNESS WHEREOF, I have hereunto set my hand.</p><p style="text-align: center;">_____ Terri Fudens</p><p style="text-align: right;">Page 227</p></div>	

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